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Of Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
EUGENE DIVISION

ADAMS, ROBERT; ANDERSON, CAREY;
ANDERSON, KAREN; ANDERSON, MARCIA;
ARCHER, CHARLOTTE; ARIAN, CAROL; ARNOLD,
CARALYN; BAKER, CHRISTOPHER; BARR,
JEANNIE; BARR, MARK; BARRANTI, MARGO;
BATES, JR., ALLEN; BATES, SANDRA; BEAUBIEN,
MARK; BEHM, NANCY; BETHELL, LAURIE;
BETHELL, RAFE; BOOTH, MURRAY; BOOTH,
SARA; BORJESSON, DEBRA; BORJESSON, RANDY;
BRANDAL, CHERYL; BRANDAL, JEFFERY; BRINN,
LAURA; BROOKS, BRADY; BROOM, CAROLLYN;
BROOM, JAMES LELAND; BUTLER, EDWARD;
CAMPBELL, CASSIDY; CAMPBELL, DANIEL;
CAMPBELL, JENNIFER; CAMPBELL, JOAN;
CAMPBELL, PATRICK; CAMPBELL, ROBERT;
CANFIELD, JAMES; CANFIELD, SHERRIE; CERVI-
SKINNER, JAMIE; CERVI-SKINNER, STEVEN;
CLARK, CODEE; CONNER, JANELLE; CONNER,
KURT; COURTNAGE, CHERYL; COURTNAGE,
JOHN; COURTNEY, CYNTHIA; COVENY,
CARLETON TERENCE; COX, GEORGE; CURRY,
ALAN; DAHL, SHELIA; DELEON, CHRIS; DELEON,
LEIAN; DOUGLAS, LINDA; EASON, DEBORAH;
ELERSICH, CHRISTINE; ERDAHL, CHRIS; ERDAHL,
JODI; FAGER, JEANNE; FAIR, GARY; FIRESTONE,
MERRICK; FIRESTONE, MONICA; FITZGERALD,
JIM; FLINT, GENE THOMAS; FORREST, TRACY;
FRASER, QUENTON; GABBARD, MARSHA;
GABBARD, SONNY; GABRIEL, ELIZABETH;
GABRIEL, STEVE; GARNER,
NAILAH; GASANOVA, ELNARA; GIBSON, RYAN;
GODFREY, MARGARET; GODFREY, MICHAEL;

Case No: 6:24-cv-00092

COMPLAINT

(Negligence, Negligence
Per Se, Gross
Negligence, Trespass)

JURY TRIAL
DEMANDED

GODSY, ELAINE; GODSY, RICHARD; GRAVITT, GEF; GRAVITT, II, GEF; GREB, ANABELLA; GREB, GEORGE; GUMPERT, EMILY; HENSON, LESA; HICKMAN, DOUGLAS; HICKMAN, ERIC; HOFFMAN, JACKLYN; HOGAN, HEATHER; HUTCHINSON, HELEN; IVEY, JACOB; JOHNSON, ELLEN; JOHNSON, STEVE; KANE, DANIEL; KANE, SALLY; KARNECKI, KY; KNIGHT, KAYLA; KNIGHT, SHANNON; KNIGHT, TRACY; KOEHLER, BETTY personally and DBA IKE'S PIZZA; KRUSE, MICHAEL; KUMM, BRAD; KUMM, LORI; LANDGREEN, SCOTT; LANG, DONNEL; LAVOIE, CHRISTOPHER; LAWSON, JOSEPH; LOWRY, ANDREA; LOWRY, JOHN; LOWRY, TODD; LUTTRELL, TANYA; MADDOCK, THOMAS; MARCHACOS, ADAM; MARCHACOS, DENISE; MAYORGA, BEVERLY; MCINNIS, MARK; MCWILLIAMS, ANDY; MCWILLIAMS, ELIZABETH; MERRILL, RAYMOND; MINER, ELLEN; MINER, RONALD; MOORE, ANDRE; MOORE, ANTHONY; MOORE, LAURIE; MORDEN, CHARLES; MORRIS, COLTON; MORRIS, GALE; MORRIS, MOLLY; MORTIMER, DENNIS CHARLES; MOSS, LESLIE; MOSS, PETER; MOYER, CYNDIE; MURPHY, DAVID; MYERS, JANICÉ; MYHRVOLD, CYNTHIA; MYHRVOLD, JERRY; NESSLIN, KATHLEEN; NUGENT, SHAUN; O'LEARY, MARION; POLAMERO, DARYL LYNN; POLAMERO, PERRY; PROUT, LINDA; RAGAN, ANITA; RANDALL, CAMERON SIMPSON; RANDALL, KATELYN; RAWLES, JORDAN; RAWLES, JR., KENNETH LEE; RICHARDS, BRIAN; RICKS, TOM; ROBERTS, THOMAS; RODERICK, CARL; RODERICK, ROBBIN; ROSE, JACK T.; ROSE, JUDITH; SANDERS, LYNETTE; SANGERMANO, FRANCES; SANGERMANO, LOU; SATHER, ELLEN; SCHMITT, MCKENNA; SHARIFIE, MAJEED; SIMMONS, JARED; SIMMONS, KATHRYN; SIMPSON, DAVID; SIMS, GLENN; SNYDER, RONALD; SPADY, PATRICIA; STEVENS, BRANDON; SUGHROUE, MARIA; SUGHROUE, SETH; SWALLOW, AMIE; SWALLOW, JAMES; SWEZEY, DWAYNE; SWEZEY, LANA; TERBORG, JAMES; TERRY, JANE; THOMPSON, JOAN; VERALRUD, DEBRA;

VERALRUD, GREGORY; VICTOR, MICHELE;
WATTS, JAMES; WEICHSELBAUM, LEE;
WENDLAND, MERIDETH; WILKERSON, ORVILLE
E.; WILKERSON, TINA; WILLIAMS, LINDA K.;
WILSON, DAN; WILSON, MARILEE; WRIGHT,
KIRK; WRIGHT, SCOTT; YOUNG, CRAIG VAN;
ZAMORA-FRASER, MILER; ZIETZ, CARL;
ZIMMERMAN, KELLY; AIETA, MARISA, TRUSTEE
OF THE DIVINE RESTORATIONS INVESTMENT
TRUST; ANDERSON, KAREN, TRUSTEE OF THE T &
K ANDERSON TRUST; ARCHER, CHARLOTTE,
TRUSTEE OF THE ARCHER FAMILY TRUST;
BEHM, JERRY, TRUSTEE OF THE DOROTHY L
BEHM FAMILY TRUST; BEHM, JERRY, TRUSTEE
OF THE DOROTHY L. BEHM MARITAL TRUST;
BEHM, JERRY, TRUSTEE OF THE FRED BEHM FBO
NANCY BEHM IRREVOCABLE TRUST; CALL,
MERLIN, TRUSTEE OF THE TAYLOR FAMILY
TRUST; COVENY, CARLETON T., TRUSTEE OF THE
CARLETON T. COVENY REVOCABLE LIVING
TRUST; COX, GEORGE, TRUSTEE OF THE COX
FAMILY TRUST; DAVENPORT, DEBORAH,
TRUSTEE OF THE ELEANOR STUCK TRUST;
FIRESTONE, MERRICK, TRUSTEE OF THE
FIRESTONE FAMILY TRUST; GODFREY, MICHAEL,
TRUSTEE OF THE GODFREY LIVING TRUST;
HUTCHINSON, HELEN, TRUSTEE OF THE HELEN
A. HUTCHINSON LIVING TRUST;
MADDOCK, THOMAS, TRUSTEE OF THE MADDOCK
AND ACHESON FAMILY TRUST; MCWILLIAMS,
ANDY AND ELIZABETH, TRUSTEES OF THE
MCWILLIAMS LIVING TRUST; MORROW, SCOTT,
TRUSTEE OF THE MELVIN A. MORROW
REVOCABLE LIVING TRUST; O'LEARY, MARION,
TRUSTEE OF THE MARION O'LEARY LIVING
TRUST; POLAMERO, PERRY AND DARYL LYNN,
TRUSTEES OF THE POLAMERO FAMILY TRUST;
BROOKS, KAREN, TRUSTEE OF THE BROOKS
FAMILY TRUST; ROSE, JUDITH, TRUSTEE OF THE
ROSE JOINT TRUST; SANGERMANO, LOU AND
FRANCES, TRUSTEES OF THE SANGERMANO
FAMILY TRUST; SPADY, PATRICIA, TRUSTEE OF
THE PATRICIA K. SPADY TRUST; THOMPSON,
JOAN, TRUSTEE OF THE THOMPSON FAMILY

TRUST; ZIETZ, CARL, TRUSTEE OF THE ZIETZ LIVING TRUST; BATES CATERING, INC.; MCKENZIE MIST, AN ASSUMED BUSINESS NAME OF M & M H2O, INC.; BASH RESIDENTIAL, LLC; EARTH QUEST PARTNERS, LLC; EARTHSCAPES OF OREGON, LLC; EMSEA CREATIVE, LLC; FINN ROCK TIMBER LLC; ILLAHE PROPERTIES, LLC; IRON FOREST OREGON, LLC; M&M LAND AND CATTLE CO., LLC; NUGENT HOLDINGS LLC; OREGON MOUNTAIN ADVENTURES, LLC; PLAID HEDGEHOG, LLC; SEQUOIA ENVIRONMENTAL SERVICES, LLC; TAYLOR BROTHERS TIMBER, LLC; THE OREGON CLIFF HOUSE, LLC; WHISPERING PINES OREGON, LLC; WILD MOUNTAIN, LLC; CAMPBELL, JENNIFER, AS GUARDIAN AD LITEM FOR CALEB CAMPBELL (A MINOR); CONNER, KURT, AS GUARDIAN AD LITEM FOR JACK CONNER (A MINOR); CONNER, KURT, AS GUARDIAN AD LITEM FOR JOSEPH CONNER (A MINOR); CONNER, KURT, AS GUARDIAN AD LITEM FOR JUNIPER CONNER (A MINOR); GASANOVA, ELNARA , AS GUARDIAN AD LITEM FOR DIMITRI MACDONALD (A MINOR); GASANOVA, ELNARA , AS GUARDIAN AD LITEM FOR ANASTASIA MACDONALD (A MINOR); KRUSE, MICHAEL, AS GUARDIAN AD LITEM FOR SEQUOIA BAKKUM-KRUSE (A MINOR); SIMPSON, DAVID, AS GUARDIAN AD LITEM FOR KALEB SIMPSON RANDALL (A MINOR),

Plaintiffs

v.

BONNEVILLE POWER ADMINISTRATION, a Federal Entity; EUGENE WATER & ELECTRIC BOARD, an Oregon registered electric utility and Oregon corporation, dba EWEB; LANE ELECTRIC COOPERATIVE, INC., an Oregon cooperative corporation; and DOES 1 through 50, inclusive,

Defendants.

INTRODUCTION

1. This is a complaint against Bonneville Power Administration (“BPA”), Eugene Water & Electric Board (“EWEB”), Lane Electric Cooperative, Inc. (“LEC”), and Does 1 through 50 (collectively, “Defendants”) for recovery of damages caused by the Holiday Farm Fire that began on September 7, 2020 (“Holiday Farm Fire”).

2. This lawsuit is brought by individuals, minors (through their Guardians *Ad Litem*), trusts (through their trustees), and business entities seeking recovery of damages caused by the Holiday Farm Fire.

THE PARTIES

Plaintiffs:

3. Each named Plaintiff owned or occupied real property and maintained personal property within Lane County that was damaged, destroyed, and/or substantially diminished in value by the Holiday Farm Fire. A substantial portion of Plaintiffs also seek non-economic damages caused by personal injuries, including emotional and mental distress caused by the Holiday Farm Fire.

Bonneville Power Administration:

4. The Bonneville Power Administration was and is a nonprofit federal power marketing administration based in the Pacific Northwest. Although part of the U.S. Department of Energy, it is self-funding and covers its costs by selling its products and services. BPA markets wholesale electrical power from 31 federal hydroelectric projects in the Northwest, one nonfederal nuclear plant and several small nonfederal power plants. BPA provides about 28 percent of the electric power used in the Northwest. BPA also operates and maintains about three-fourths of the high-voltage transmission power lines in its service territory which includes Idaho, Oregon, Washington. BPA maintains high-voltage connection lines with other power grids outside of Oregon and Washington, and lower voltage transmission lines within Oregon that act as feeder lines into local utilities.

5. BPA operates in Oregon from its offices located at 905 NE 11th Avenue, Portland, Oregon 97232.

Eugene Water and Electric Board:

6. EWEB was and is a publicly owned registered Oregon electric utility. EWEB is vested with the power and functions of municipal government through the charter of Eugene, Oregon. Its primary administrative center is located at 4200 Roosevelt Boulevard, Eugene, Oregon 97402. It conducts regular and sustained business in Oregon and Lane County. EWEB owns and operates powerlines and other infrastructure and equipment in Oregon used to transmit, supply, and provide electricity to private and public consumers. EWEB provides electricity and water service to more than 200,000 customers in and around Eugene, Oregon, and has over 13,000 miles of overhead power lines.

Lane Electric Cooperative, Inc.:

7. At all relevant times, Defendant Lane Electric Cooperative, Inc. (“LEC” or “Lane Electric”) was a registered electric utility organized as a cooperative non-profit corporation under Oregon law. Its primary offices are located at 787 Bailey Hill Road, Eugene, Oregon 97402. LEC is owned by the over 12,000 members it serves, consisting of approximately 13,000 electric accounts and over 1,479 miles of overhead electrical facilities, including 54 miles of transmission lines.

Does 1 through 50:

8. Defendants Does 1 through 50 are currently unknown to Plaintiffs and therefore sued under fictitious names. Plaintiffs are informed and believe, and therefore allege that each of the Defendants designated herein as Doe is legally responsible in some manner for the acts and omissions referred to in this complaint. Plaintiffs anticipate seeking leave to amend this Complaint when they determine the true names and capacities of Does 1 through 50.

JURISDICTION AND VENUE

9. This Court has general personal jurisdiction over all Defendants because they

conduct substantial business in this judicial district and maintain regular business contacts and activities within Oregon.

10. This Court has original subject matter jurisdiction over claims against Defendant Bonneville Power Administration as a Federal government agency pursuant to 28 USC § 1331 and 28 USC § 1346.

11. Plaintiffs timely served valid tort claim notices on Defendant BPA in writing in accordance with 28 USC § 2401(b). Notice of Plaintiffs' claims were presented in writing more than six months before the date this action was filed. BPA has failed to respond with a formal denial of Plaintiffs' claims.

12. This Court has supplemental subject matter jurisdiction over claims against Defendants EWEB and LEC pursuant to 28 USC § 1367(a) because the claims against them form part of the same case or controversy under Article III of the United States Constitution.

13. Venue is proper in this District Court under 28 U.S.C. § 1391 because Defendants' acts and omissions causing the Holiday Farm Fire and Plaintiffs' damages occurred within this judicial district.

COMMON FACTUAL ALLEGATIONS

14. At all material times, BPA constructed, owned, maintained, and/or operated overhead power lines, together with supporting poles and appurtenances (collectively "BPA Powerlines"), for the transmission of electricity to members of the general public, including in the area of the Holiday Farm Fire. BPA provided electricity through its distribution network to local utilities in and around Lane County, Oregon including to defendants EWEB and LEC. These local utilities then sold the electrical power to owners, residents, businesses, and properties within the service areas, including to properties owned or occupied by Plaintiffs.

15. At all material times, EWEB constructed, owned, maintained, and/or operated overhead power lines, together with supporting poles and appurtenances (collectively "EWEB Powerlines"), for the transmission of electricity to members of the general public throughout

Lane County, including in the area of the Holiday Farm Fire. EWEB provided electricity over its EWEB Powerlines to residents, businesses, and properties in the area, including property owned or occupied by Plaintiffs.

16. At all material times, LEC constructed, owned, maintained, and/or operated overhead power lines, together with supporting poles and appurtenances (collectively “LEC Powerlines”) for the transmission of electricity to members of the general public, including in the area of the Holiday Farm Fire. LEC provided electricity over its LEC Powerlines to its members in and around Eugene and Lane County, including Plaintiffs.

17. Throughout the summer of 2020 most of Oregon, including the area in and around the Holiday Farm Fire, experienced historically dry conditions. Records from Oregon State University show that the area had less than 1/10 inch of rain in July 2020, less than 2/10 inch in August 2020, and a similar rainfall deficit during the first week of September 2020.

18. The National Oceanic and Atmospheric Administration’s National Weather Service (“NWS”) Storm Prediction Center provides Fire Weather Outlooks. These are intended to delineate areas of the continental U.S. where pre-existing fuel conditions combined with forecast weather conditions during the next 8 days will pose a significant threat of the ignition and/or spread of wildfires. The Outlooks are designed for use by the NWS, as well as federal, state, and local government agencies. The Fire Weather Outlook for the Holiday Farm Fire area on Monday September 7, 2020 was "critical." That level indicated an extreme risk of wildfire in the area based on wind, relative humidity, and other factors.

19. On September 6, 2020, the NWS issued a warning that critical fire weather was imminent in the area, with easterly winds gusting in excess of 50 mph and relative humidity dropping below 20%. These extremely dangerous environmental conditions, coupled with the heavy dry fuel load and terrain in the area created a highly foreseeable and extreme risk of wildfire ignition and spread.

20. The Holiday Farm Fire began in the late afternoon and early evening of

September 7, 2020 near the McKenzie River in Lane County, Oregon. It resulted from the merger of two smaller fires with separate points of origin.

21. The first, the “BPA Fire” ignited south of the McKenzie River and Highway 126 between highway mileposts 42 and 43. It began when a large tree was blown into the Cougar-Holden Creek 115kV transmission line operated by BPA (“Cougar-Holden 115 kV line”).

22. The second, the “EWEB/LEC Fire” ignited west of Rainbow, Oregon near highway milepost 47 and the Holiday Farm RV Park. It began when a tree was blown into EWEB’s 115 kV Transmission line (“EWEB 115 kV Line”), causing it to contact LEC’s still-energized 34.5 kV distribution line (“LEC 34.5 kV Line”) located below.

23. Westbound wind gusts up to 70 mph and sustained winds of 50 mph fueled the BPA and EWEB/LEC Fires, causing them to rapidly increase in size and intensity.

24. The two Fires merged, gained energy, and together became the “Holiday Farm Fire.” The merged Fires raced toward Blue River, engulfing the town before morning and killing one resident, then onward toward Vida and Deerhorn as shown in Figure 1, below.

25. The Holiday Farm Fire burned approximately 173,393 acres and 723 structures.

26. The pink portion of Figure 1, below, shows the Holiday Farm Fire’s perimeter (“Holiday Farm Fire Area”). The area between Rainbow and Blue River is outlined in red.

27. Figure 2 is a map of the highway milepost markers relevant to the BPA and EWEB/LEC Fires and their origins.

28. Figure 3 shows the location of BPA’s Cougar-Holden 115 kV, three phase transmission line.

Figure 1.

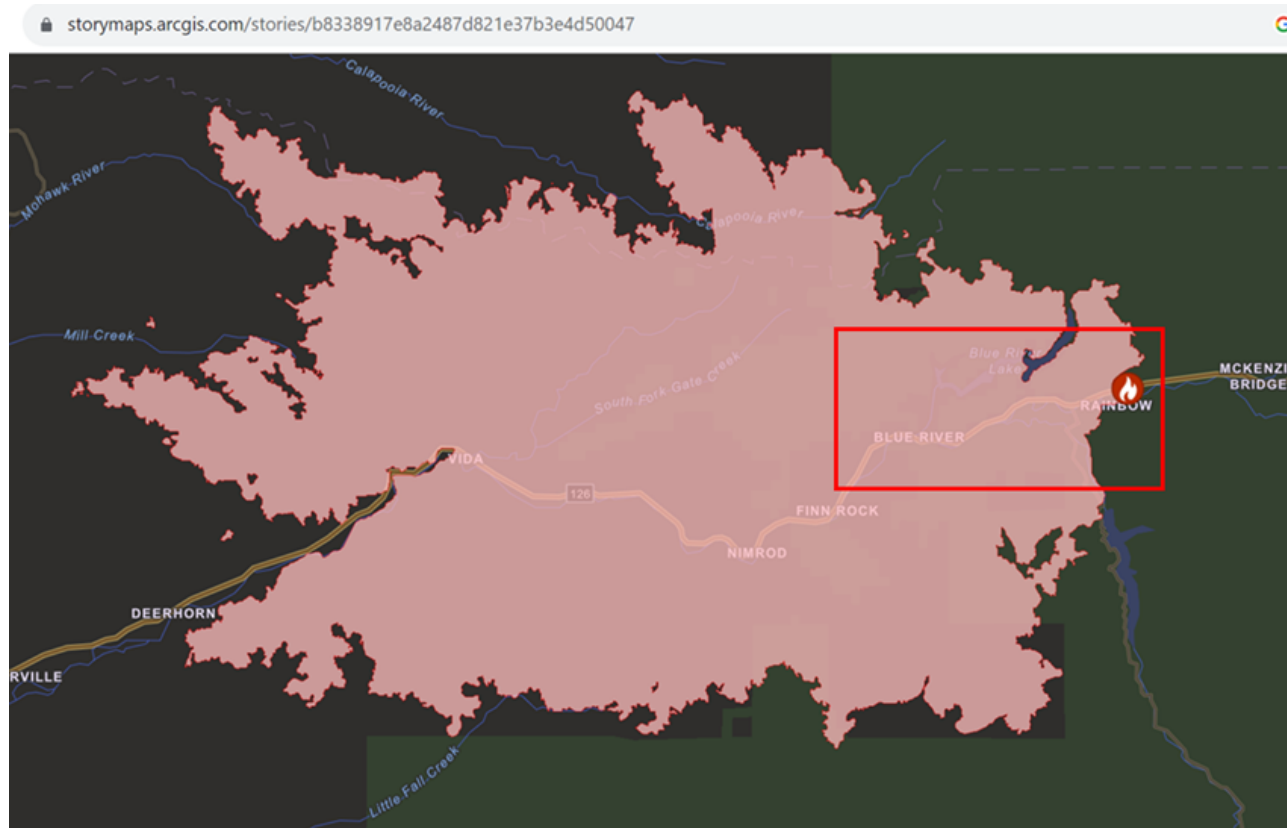
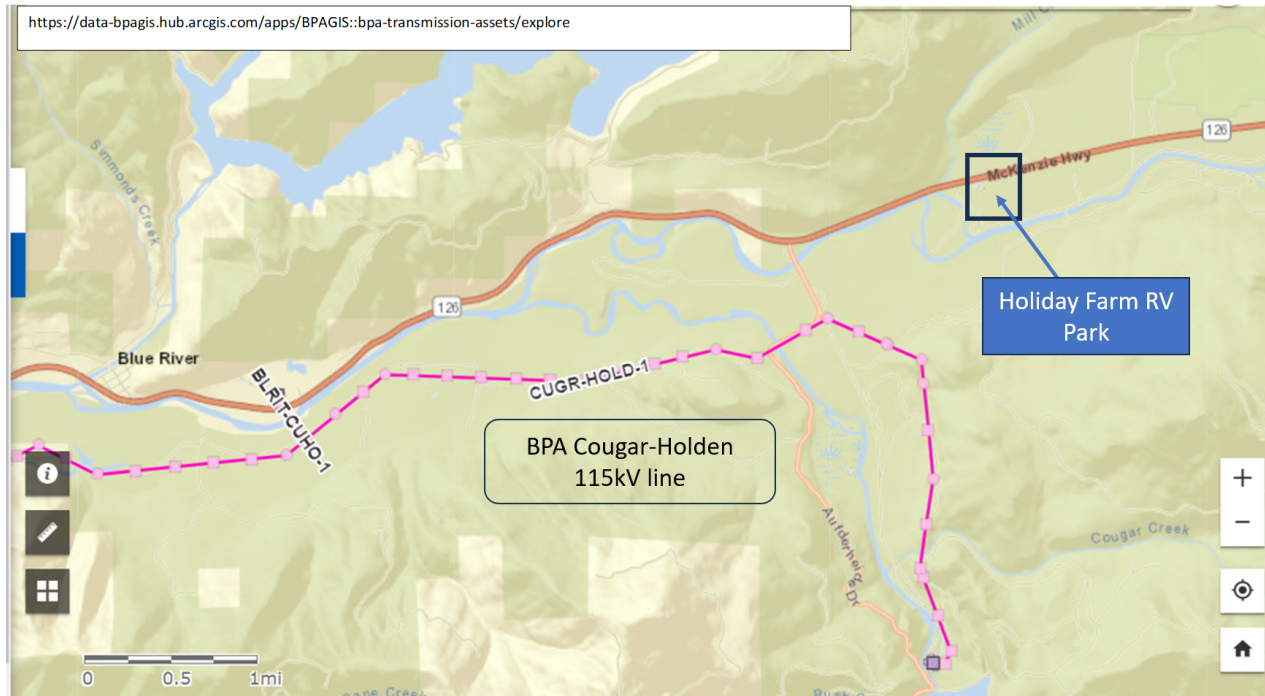


Figure 2.



Figure 3.



BPA FIRE

Origin:

29. A “Danger Tree” is a tree on or off a utility’s right-of-way that could come into contact with electric supply, distribution, or transmission lines by growing, falling, swaying, or sagging into the lines. See, ANSI A300, Part 7.

30. In 2016, four years before the Holiday Farm Fire, BPA performed a LiDAR imaging inspection on the Cougar-Holden 115 kV line. That inspection revealed a tall stand of trees adjacent to the line that were “Danger Trees,” able to contact or fall into the line. The LiDAR inspection showed that several trees in the stand were over 90 feet tall with only 60 feet of clearance to the nearest power line.

31. On information and belief, BPA permitted similar Danger Trees to exist along the Cougar-Holden 115 kV line near the time of the Holiday Farm Fire.

32. On September 7, 2020 at 8:00 p.m., Doug Grafe, the chief of fire protection at the

Oregon Department of Forestry, and Nik Blosser, the Oregon Governor's Chief of Staff called BPA and other utilities. The call was to inform BPA and others of the existing issues in areas of Oregon served by the utilities. The issues included high winds, downed power lines, existing fires, and a high level of fire risk. The call was also to request that BPA and others deenergize their power lines and implement a public safety power shutoff ("PSPS") to avoid potential fire ignitions from BPA's and others power lines.

33. BPA did not agree to deenergize its power lines or to implement a PSPS during the call and did not do so after the call.

34. On September 7, 2020 a Danger Tree fell into the Cougar-Holden 115 kV line at a point south of the McKenzie River between Highway 126 mileposts 42 and 43.

35. Shortly after that, BPA registered a fault on its 115 kV line from an interrupted circuit.

36. BPA later determined that the fault was caused by a tree-to-line contact. A large Danger Tree fell into to the Cougar-Holden 115 kV line pushing the A and B phases conductors together near BPA structure 5/2, starting the BPA Fire.

37. The Danger Tree that caused the fault and fire was located adjacent to BPA's right-of-way in the area that BPA had LiDAR imaged or otherwise inspected for Danger Trees in 2016.

Vegetation Management:

38. BPA is responsible for its own vegetation management practices and has internal policies relating go vegetation management.

39. BPA acknowledges that vegetation and Danger Trees too close to power lines create a public wildfire risk:

[E]lectricity can "arc" or "flashover" from wires, through the air, to trees, other vegetation or equipment up to 15 feet away, where it can cause fires, injuries or even fatalities to anyone nearby. Another danger is that electricity from the line can make a tree branch so hot it catches fire, which can threaten homes in residential neighborhoods and spark wildfires in rural areas. With BPA's new clearance

standards, if a tree can grow close enough for a power line to sag into the range where it can cause an outage, the tree must be removed. BPA also routinely surveys areas bordering its transmission corridors to watch for “danger trees,” large trees that may fall over on power lines or grow close enough to swing into them with the help of a little wind. The combination of fast-growing trees and BPA’s cyclical maintenance program means that removal, rather than trimming, of tall trees is the best way to ensure the new safety standards are met.

Bonneville Power Administration DOE/BP-4762 July 2016

40. BPA’s public statements indicate that Danger Trees must be removed, not trimmed, to ensure they do not grow to pose a danger to its power lines before the next scheduled inspection and maintenance cycle:

Crews clear trees and brush that could grow within 25 feet of the lowest point the conductor could sag to on a hot day. If we find a 10-foot Douglas fir tree growing under the line, we remove it because the tree’s mature height will eventually violate the 25-foot clearance limit. We may also remove or trim trees near the right-of-way that could fall onto the line.

Bonneville Power Administration DOE/BP-3901 / July 2008.

Inspection and Maintenance:

41. BPA’s maintenance program requires all transmission lines be inspected regularly on a three-to-ten-year cycle, depending on topography, location, and vegetation type to maintain minimum vegetation clearances of ten feet for transmission lines of 230 kV or less. It also requires BPA to discover and remove Danger Trees.

42. BPA knew or should have known that its electrical transmission system, which includes its electrical facilities, powerlines, conductors, power poles, reclosers, and all other electrical equipment (collectively “BPA Electrical System”) is a dangerous instrumentality. BPA’s transmission of electricity required it to exercise a level of care commensurate with and proportionate to the hazards associated with the BPA Electrical System, and in compliance with standards BPA has adopted to ensure the safety and reliability of its Cougar-Holden 115 kV line.

EWEB/LEC FIRE

Origin:

43. During the Summer of 2020 the Holiday Farm Fire Area experienced historically dry conditions, with significantly less rainfall than usual, heightening the risk of wildfire.

44. On September 4, 2020, LEC's general manager received an email at 6:34 a.m. from AlertSense.com titled "Fire Weather Watch," highlighting the risk of fire from the prevailing weather conditions.

45. On September 5, 2020 LEC's general manager received another email from AlertSense.com titled "Fire Weather Warning," warning of hot, dry, and windy conditions expected from Monday afternoon through evening.

46. On September 6, 2020 the National Weather Service's Portland office sent an email at 2:02 p.m. to EWEB and various utilities advising of hot, dry, and very windy conditions forecasted for the next few days.

47. On Sunday, September 6, 2020 at 2:02 p.m., the National Weather Service's Portland office ("NWS") sent an email to EWEB and various utilities advising that:

"Monday, Tuesday and Wednesday are panning out to be hot, dry and very windy. Please see the attached briefing talking more about what we are expecting."

48. The briefing attached to the NWS email forecasted "high winds" and "critically dry" conditions for Monday evening, September 7, 2020 as well as a "Red Flag Warning" beginning at 11:00 a.m. on Monday, September 7, 2020 until Wednesday, September 9, 2020.

49. An NWS "Red Flag Warning" is a critical alert issued to inform the public, governmental entities, utility operators, and firefighting agencies about the imminent or ongoing conditions that are highly favorable for the outbreak of wildfires. A primary purpose of a Red Flag warning is to raise awareness among the recipients, so they take appropriate precautions such as initiating a PSPS or setting system breakers to the "lockout" mode.

50. Conditions supporting a Red Flag warning typically include a combination of

strong winds, low relative humidity, and dry fuels. On September 7, 2020 the Holiday Farm Fire Area presented all three. There were also additional risk factors - a high fuel load, a significant amount of rugged mostly inaccessible terrain, and a narrow east-west valley to funnel the prevailing east-west wind and fire.

51. EWEB did not set its Creek Substation circuit breakers PCB No. 7170 and PCB No. 7180 to the "lockout" mode at any relevant time before the September 7, 2020 Holiday Farm Fire.

52. On September 7, 2020 at approximately 5 p.m. high winds with gusts over 50 miles per hour were seen throughout the Holiday Farm Fire Area, with several reports of falling trees across Highway 126.

53. On September 7, 2020, around 5:24 p.m. circuit breakers No. 7170 and No. 7180 in EWEB's Holden Creek Substation detected a fault in the system. These circuit breakers opened the circuit and stopped the flow of electricity.

54. In the Holiday Farm Fire Area, the electrical distribution systems included circuit breakers with a "reclose" and a "lockout" mode. In the reclose mode, if the circuit breaker trips due to a temporary issue, it automatically checks and resumes power once the issue is resolved, avoiding unnecessary power outages. Alternatively, the lockout mode ensures that after a fault, the breaker remains off, halting power flow until the problem is manually addressed and resolved.

55. Because the circuit breakers in EWEB's Holden Creek Substation were set to reclose mode and not the safer lockout mode, approximately 50 seconds after the initial fault, both circuit breakers reclosed and reenergized the LEC 34.5 kV line crossing under the EWEB 115kV line near MP 47 on McKenzie Highway.

56. On September 7, 2020 at 7:40 p.m. LEC received a report of a tree through a power line and damage to a pole. Even so, LEC failed to deenergize its Powerlines or change its breakers from the reclose mode to the safer lockout mode.

57. At all times after 5:25 p.m., and during the high wind event EWEB's 115kV Line was deenergized, but the LEC 34.5 kV Powerline crossing below it remained energized. The relevant EWEB and LEC breakers providing power to the LEC 34.5 kV powerline were set to reclose mode.

58. On September 7, 2020 at 8:10 p.m. a Danger Tree fell on the deenergized EWEB 115kV Line, putting it against the still-energized LEC 34.5 kV line below. Because the LEC 34.5 kV line was energized, and because EWEB and LEC breakers were set to the reclose mode, this contact reenergized the EWEB 115 kV line with sufficient electricity to cause surrounding vegetation to ignite, starting the EWEB/LEC Fire.

59. On September 7, 2020 at 8:17 p.m. the local emergency service received the first call reporting the EWEB/LEC Fire. The Upper McKenzie Rural Fire Protection District was dispatched almost immediately.

60. On September 7, 2020 at 8:30 p.m. - after the EWEB/LEC Fire started - LEC sent a troubleshooter to set their breakers to lockout mode.

EWEB's Inaction Caused a Delay Allowing the Fire to Spread:

61. Shortly after the EWEB/LEC Fire ignited, the Upper McKenzie Rural Fire Protection District and others arrived ready to extinguish the Fire while it could still be contained and controlled.

62. A downed and potentially energized high voltage power line presents an extreme risk of electrocution to firefighters and emergency workers suppressing fire using water or foam.

63. Because of that risk, firefighters and emergency workers must verify that the fallen powerlines are deenergized before putting water or foam on the fire.

64. LEC unreasonably delayed deenergizing its power lines after the initial fault, then again the subsequent fault and Fire near MP 47 on McKenzie Highway. This delay hindered initial firefighting efforts and contributed to the rapid and uncontrolled spread of the EWEB/LEC Fire.

65. The Upper McKenzie Rural Fire Protection District, other emergency workers, or those acting on their behalf made calls to EWEB to determine whether its fallen powerlines were deenergized. For at least one hour and 20 minutes, no one at EWEB with the appropriate authority answered or returned the calls, or otherwise responded with information regarding the status of EWEB's powerlines.

66. At the time the EWEB/LEC fire ignited, the wind gusts were estimated to be around 60 miles per hour with sustained winds of 40 miles per hour, causing the fire to spread rapidly. Because of LEC's delays and EWEB's non-response, firefighters and emergency workers had to stand by while the EWEB/LEC fire spread westward and became uncontrollable, eventually merging with the BPA fire to become the Holiday Farm Fire.

Vegetation Management:

67. In Oregon, regulation of vegetation management for local, non-federal electrical utilities is primarily overseen by the Oregon Public Utility Commission ("PUC"). The PUC is responsible for ensuring that electric utilities maintain safe, reliable, and secure operations of their systems, including vegetation management around power lines, utility poles, and substations.

68. The Oregon Administrative Rules set requirements for vegetation management. According to OAR 860-024-0016, utilities must maintain minimum clearances of vegetation from conductors. These clearances vary based on the voltage of the conductors, with a requirement of seven and one-half feet of clearance for conductors energized at 50,001 to 200,000 volts (>50kV to 200 kV), and five feet for conductors energized at 600 to 50,000 volts. The rules also consider voltage, location, configuration and sag of conductors under wind loading; and the growth habit, strength, and health of vegetation growing adjacent to the conductor, with the combined displacement of the vegetation, supporting structures, and conductors under adverse weather or routine wind conditions.

69. Oregon has also adopted the *National Electrical Safety Code* ("NESC"). Part 2 -

Vegetation Management.

70. Section 20, Para. 218 (B) of the NESC requires:

At line crossings *** the crossing span and the adjoining span on each side of the crossing should be kept free from overhanging or decayed trees or limbs that otherwise might fall into the line.

71. EWEB and LEC knew or should have known that their electrical transmission systems, which included their electrical facilities, powerlines, conductors, power poles, reclosers, and all other electrical equipment (collectively “EWEB Electrical System” and “LEC Electrical System”) are dangerous instrumentalities. EWEB and LEC were required to exercise a level of care proportionate to the hazards associated with the operation of their Electrical Systems.

72. EWEB and LEC knew or reasonably should have known that their Powerlines cross or are close to each other at locations within their service areas, including the crossing near highway milepost 47, requiring both to exercise an increased level of care, communication, and maintenance regarding those unique locations.

HOLIDAY FARM FIRE

73. High winds, burning embers, dry conditions, terrain, a high fuel load, and other factors caused the BPA and EWEB/LEC Fires to expand and merge into the Holiday Farm Fire during the night of September 7, 2020.

74. The BPA Fire, the EWEB/LEC Fire, and the resulting Holiday Farm Fire were caused by negligent and improper inspection, maintenance, ownership, and operation of Defendants’ Electrical Systems as detailed below.

75. As a result of the Defendants’ acts and omissions, Plaintiffs have incurred damages and injuries as detailed in this Complaint and Exhibit A.

76. Plaintiffs timely filed Federal Tort Claim Notices against BPA for damages caused by the Holiday Farm Fire. BPA failed to deny or respond claims. This lawsuit and Plaintiffs’ claims are timely.

PLAINTIFFS’ DAMAGES

Robert Adams

77. At the time of the Holiday Farm Fire, Robert Adams owned real and personal property located at 47611 McKenzie Highway, Vida, Oregon and within the Holiday Farm Fire Area.

78. The Holiday Farm Fire destroyed Adams' residence, damaged or destroyed numerous other structures and outbuildings and personal property, destroyed a significant amount of timber, landscaping, decorative trees, and other beneficial foliage.

79. Adams has been denied use of his real and personal property since the time of the Fire and has incurred costs to inspect, clean, repair, replant, and/or restore his real and personal property to its original condition.

80. The market value of his property has been significantly reduced.

81. Because of the Fire, Adams has incurred costs and expenses necessary to secure and maintain alternative housing.

82. Adams' economic losses are currently estimated as set forth in Exhibit A.

83. Adams inhaled smoke and ash from the Fire, causing eye irritation and sore throat.

84. He has experienced stress, fear, inconvenience, worry, anxiety, annoyance, aggravation, crying, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

85. Adams' non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Carey Anderson

86. At the time of the Holiday Farm Fire, Carey Anderson owned real and personal property located at 46080 McKenzie Highway, Vida, Oregon and within the Holiday Farm Fire Area.

87. The Holiday Farm Fire destroyed Anderson's real and personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Anderson has been denied use of the described real and personal property since the time of the Fire, and has incurred costs to inspect, clean, repair, replant, and/or restore the real and personal property to its original condition.

88. The market value of the property has been significantly reduced.

89. Because of the Fire, Anderson has incurred costs and expenses necessary to secure and maintain alternative housing.

90. Anderson's economic losses are currently estimated as set forth in Exhibit A.

91. Carey Anderson injured her back while removing trees from the Fire. She also suffered smoke inhalation and respiratory distress caused by exposure to smoke and ash.

92. She has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

93. Carey Anderson's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Karen Anderson

94. At the time of the Holiday Farm Fire, Karen Anderson resided and maintained personal property at 51290 McKenzie Highway, Vida, Oregon, property owned by the T & K Anderson Trust and within the Holiday Farm Fire Area.

95. Anderson's personal property destroyed in the Fire included a 1969 Volkswagen truck, motorcycle, professional photography equipment, hard drives containing valuable photographic work, collectible books, and other personal property.

96. Anderson has also been denied use of the described real and personal property since the

time of the Fire.

97. Because of the Fire, Anderson has incurred costs and expenses necessary to secure and maintain alternative housing.

98. Anderson's economic losses are currently estimated as set forth in Exhibit A.

99. Anderson has suffered respiratory distress, headaches, and a sore throat from smoke inhalation during the Fire. She also injured her shoulder trying to open her heavy overhead garage door while evacuating because the automatic garage door opener did not operate when the power was out.

100. She has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

101. Anderson's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Marcia Anderson

102. At the time of the Holiday Farm Fire, Marcia Anderson owned real and personal property located at 46080 McKenzie Highway, Vida, Oregon and within the Holiday Farm Fire Area.

103. The Holiday Farm Fire destroyed Anderson's real and personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Anderson has been denied use of the described real and personal property since the time of the Fire, and has incurred costs to inspect, clean, repair, replant, and/or restore the real and personal property to its original condition.

104. The market value of the property has been significantly reduced.

105. Because of the Fire, Anderson has incurred costs and expenses necessary to secure and maintain alternative housing.

106. Anderson's economic losses are currently estimated as set forth in Exhibit A.

107. Marcia Anderson suffered smoke inhalation and respiratory distress caused by exposure to the smoke and ash, for which she sought medical treatment. She also suffered cuts, bruises and injured her shoulder while removing debris after the Fire on her property, and while searching for her possessions in the debris.

108. She has experienced stress, fear, inconvenience, and emotional and mental distress and sought mental health counseling because of the bodily injuries caused by the Holiday Farm Fire.

109. Anderson's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Charlotte Archer

110. At the time of the Holiday Farm Fire, Charlotte Archer owned real and personal property located at 90121 and 90197 Gale Creek Road, Vida, Oregon, and maintained personal property at real property owned by the Archer Family Trust located at 46141 Goodpasture Road, Vida, Oregon, all within the Holiday Farm Fire Area.

111. The Holiday Farm Fire destroyed Archer's real and personal property, including two houses, a shop, a carport, a boat shed, structures, other personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Archer has been denied use of the described real and personal property since the time of the Fire, and she has incurred costs to inspect, clean, repair, replant, and/or restore her real and personal property to its original condition. The market value of her property has been significantly reduced.

112. Because of the Fire, Archer has incurred costs and expenses necessary to secure and maintain alternative housing.

113. Archer's economic losses are currently estimated as set forth in Exhibit A.

114. Archer also suffered respiratory distress, eye irritation, and sore throat from smoke inhalation from the Fire. Because of the Fire, she suffered a transient ischemic attack (TIA) and stroke and developed irritable bowel syndrome. Prior to the Fire, she did not experience any of these symptoms.

115. She has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

116. Archer's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Carol Arian

117. At the time of the Holiday Farm Fire, Carol Arian owned real and personal property located at 47145 Goodpasture Road, Vida, Oregon 97488 and within the Holiday Farm Fire Area.

118. The Holiday Farm Fire destroyed Arian's real and personal property, including a home with garage, "A" frame structure, dog kennel, covered picnic area, garden shed, chicken coop, wood storage buildings, garden, fruit trees, 2.2 acres of timber, landscaping, decorative trees, and other beneficial foliage.

119. Arian has been denied use of the damaged or destroyed real and personal property since the time of the Fire, and has and will incur costs to replace, inspect, clean, repair, replant, and/or restore her real and personal property to its original condition.

120. The market value of her property has been significantly reduced.

121. Because of the Fire, Arian has incurred costs and expenses necessary to secure and maintain alternative housing.

122. Arian's economic losses are currently estimated as set forth in Exhibit A.

123. Arian inhaled smoke and ash causing respiratory distress, cut her hands during cleanup and inspection, and suffered significant stomach and gastric upset.

124. She has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

125. Arian's non-economic losses are currently estimated to not exceed the figure set forth in Exhibit A.

Caralyn Arnold

126. At the time of the Holiday Farm Fire, Arnold resided and maintained personal property at 52511 McKenzie Highway, #20, Blue River, Oregon 97413 and within the Holiday Farm Fire Area.

127. The Holiday Farm Fire destroyed Arnold's real and personal property, including a mobile home.

128. Arnold has been denied use of the damaged or destroyed real and personal property since the time of the Fire, and has incurred costs to inspect, replace, clean, repair, and/or restore her personal property to its original condition.

129. Because of the Fire Arnold has incurred costs and expenses necessary to secure and maintain alternative housing.

130. Arnold's economic losses are currently estimated as set forth in Exhibit A.

131. Arnold inhaled smoke and ash causing respiratory distress, sore throat, and headaches. She received physical injuries when struck by a burning branch.

132. She has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

133. Arnold's non-economic losses are currently estimated to not exceed the figure set forth in

Exhibit A.

Christopher Baker

134. At the time of the Holiday Farm Fire, Christopher Baker owned real and personal property located at 46979 Goodpasture Road, Vida, Oregon and within the Holiday Farm Fire Area.

135. The Holiday Farm Fire destroyed Baker's real and personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. He has been denied use of the described real and personal property since the time of the Fire, and has incurred costs to inspect, clean, repair, replant, and/or restore the real and personal property to its original condition. To date, Baker has been unable to rebuild a livable structure on the property.

136. The market value of his property has been significantly reduced.

137. Because of the Fire and the inability to rebuild a livable structure on the property, Baker has incurred costs and expenses necessary to secure and maintain alternative housing.

138. Baker's economic losses are currently estimated as set forth in Exhibit A.

139. Baker also suffered smoke inhalation injuries and headaches from the smoke and ash created by the Fire.

140. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries caused by the Holiday Farm Fire.

141. Baker's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Jeannie Barr

142. At the time of the Holiday Farm Fire, Jeannie Barr owned real and personal property located at 41923 Deerhorn Road, Leaburg, Oregon and within the Holiday Farm Fire Area.

143. The Holiday Farm Fire destroyed Barr's real and personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Barr has been denied use of the described real and personal property since the time of the Fire, and has incurred costs to inspect, clean, repair, replant, and/or restore the real and personal property to its original condition.

144. The market value of the property has been significantly reduced.

145. Because of the Fire, Barr has incurred costs and expenses necessary to secure and maintain alternative housing.

146. Barr's economic losses are currently estimated as set forth in Exhibit A.

Mark Barr

147. At the time of the Holiday Farm Fire, Mark Barr owned real and personal property located at 41923 Deerhorn Road, Leaburg, Oregon and within the Holiday Farm Fire Area.

148. The Holiday Farm Fire destroyed Barr's real and personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Barr has been denied use of the described real and personal property since the time of the Fire, and has incurred costs to inspect, clean, repair, replant, and/or restore the real and personal property to its original condition.

149. The market value of the property has been significantly reduced.

150. Because of the Fire, Barr has incurred costs and expenses necessary to secure and maintain alternative housing.

151. Barr's economic losses are currently estimated as set forth in Exhibit A.

Margo Barranti

152. At the time of the Holiday Farm Fire, Margo Barranti owned real and personal property located at 45457 McKenzie Highway, Leaburg, Oregon, and within the Holiday Farm Fire Area.

153. The Holiday Farm Fire damaged or destroyed Barranti's real and personal property, including a woodshed and contents, pumphouse and tank, other structures, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Barranti's residence and personal property were also damaged or destroyed by smoke and soot, and she has been partially or completely denied use of the described real and personal property since the time of the Fire, and has incurred costs to inspect, clean, repair, replant and/or restore her real and personal property to its original condition.

154. The market value of her property has been significantly reduced.

155. Because of the Fire, Barranti has incurred costs and expenses necessary to secure and maintain alternative housing.

156. Barranti's economic losses are currently estimated as set forth in Exhibit A.

157. Barranti also suffered coughing, headaches, and eye irritation from the smoke and ash, and now is at risk of and in fear of getting injured from falling trees on her property as a result of the Fire.

158. She has experienced stress, fear, inconvenience, dislocation, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

159. Barranti's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Allen Bates, Jr.

160. At the time of the Holiday Farm Fire, Allen Bates, Jr. owned real and personal property located at 54455 McKenzie River Drive, Blue River, Oregon, and within the Holiday Farm Fire Area.

161. The Holiday Farm Fire damaged or destroyed Bates' real and personal property, including a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Bates has

been denied personal and commercial use of his real and personal property since the time of the Fire and has incurred costs to inspect, clean, repair, replant, and/or restore the real and personal property to its original condition.

162. The market value of the property has been significantly reduced.

163. Bates' economic losses are currently estimated as set forth in Exhibit A.

164. Allen Bates suffered smoke and ash exposure, which caused respiratory distress, sore throat, and irritated eyes.

165. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

166. Bates' non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Sandra Bates

167. At the time of the Holiday Farm Fire, Sandra Bates owned real and personal property located at 54455 McKenzie River Drive, Blue River, Oregon, and within the Holiday Farm Fire Area.'

168. The Holiday Farm Fire damaged or destroyed Bates' real and personal property, including a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Bates' has been denied personal and commercial use of the real and personal property since the time of the Fire and has incurred costs to inspect, clean, repair, replant, and/or restore the real and personal property to its original condition.

169. The market value of the property has been significantly reduced.

170. Bates' economic losses are currently estimated as set forth in Exhibit A.

171. Sandra Bates suffered smoke inhalation, irritated eyes and a sore throat from the smoke

and ash. She also suffered burns to her feet and injured her back while sifting through the debris on her property after the Fire.

172. She has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire. Bates has also treated with various medical providers for vertigo caused by stress from the bodily injuries she suffered during the Fire.

173. Bates' non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Mark Beaubien

174. At the time of the Holiday Farm Fire, Mark Beaubien owned real and personal property located at 46014 Gate Creek Road, Vida, Oregon, and within the Holiday Farm Fire Area.

175. The Holiday Farm Fire destroyed Beaubien's real and personal property, including houses and residences on the property, numerous structures and outbuildings, tools and equipment, a motorcycle, other personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Beaubien has been denied use of his real and personal property since the time of the Fire and has incurred costs to inspect, clean, repair, replant, and/or restore his real and personal property to its original condition. Beaubien's right and ability to replace or rebuild destroyed structures and residences on his property has been substantially and materially impaired because of the Fire. After facing the difficulty of rebuilding the property, Beaubien decided to sell the property and move out of state.

176. The market value of his property has been significantly reduced.

177. Because of the Fire, Beaubien incurred costs and expenses necessary to secure and

maintain alternative housing.

178. Beaubien's economic losses are currently estimated as set forth in Exhibit A.

179. Beaubien injured his knee escaping the Fire. He also suffered orthopedic injuries (muscle and joint strain and sprain) escaping the Fire and in the cleanup of debris after the Fire and suffered injuries from smoke inhalation.

180. He has experienced stress, fear, inconvenience, depression, and emotional and mental distress because of the bodily injuries caused by the Holiday Farm Fire, all of which rendered him unable to rebuild and forced him to sell his property at a loss and move out of state.

181. Beaubien's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Nancy Behm

182. At the time of the Holiday Farm Fire, Nancy Behm occupied a residence located on real property owned by the Fred Behm FBO Nancy Behm Irrevocable Trust. Behm owned personal property located within the residence, all at 91318 Blue River Road, Blue River, Oregon and within the Holiday Farm Fire Area.

183. The Holiday Farm Fire destroyed the residence and Behm's personal property. She has been denied use of the described real and personal property since the time of the Fire.

184. Because of the Fire, Behm has incurred costs and expenses necessary to secure and maintain alternative housing.

185. Behm's economic losses are currently estimated as set forth in Exhibit A.

186. While evacuating from the Fire, Behm's car was struck by a falling tree, striking her head, causing her to suffer a major concussion, whiplash, neck injury and a traumatic brain injury.

187. She has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries caused by the Holiday Farm Fire.

188. Behm's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A..

Laurie Bethell

189. At the time of the Holiday Farm Fire, Laurie Bethell owned real and personal property located at 51807 Echo Street, Blue River, Oregon, and within the Holiday Farm Fire Area.

190. The Holiday Farm Fire destroyed Bethell's real and personal property including a home, various structures and outbuildings, personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. She has been denied use of her real and personal property since the time of the and has incurred costs to inspect, clean, repair, replant, and/or restore her real and personal property to its original condition.

191. The market value of her property has been significantly reduced.

192. Bethell's economic losses are currently estimated as set forth in Exhibit A.

193. Bethell suffered severe smoke inhalation, which caused respiratory distress, eye irritation, coughing, and sore throat for weeks after the Fire, which required medical treatment.

194. She has experienced stress, fear, inconvenience,, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

195. Bethell suffers from severe emotional distress because of her bodily injuries suffered during the Holiday Farm Fire, for which she has sought mental health counseling. As a child Bethell was in a house fire, which made her particularly susceptible to emotional and mental distress from the Holiday Farm Fire, which triggered that childhood trauma and caused her to suffer extreme emotional

distress. Also, during the Fire and for a time afterward, she could not locate her son, which further aggravated her emotional and mental distress.

196. Bethell's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Rafe Bethell

197. At the time of the Holiday Farm Fire, Rafe Bethell owned real and personal property located at 51807 Echo Street, Blue River, Oregon, and within the Holiday Farm Fire Area.

198. The Holiday Farm Fire destroyed Bethell's real and personal property, including a home, various structures, and outbuildings, personal property including but not limited to a seed collection and a card collection, and a significant amount of timber landscaping, decorative trees, and other beneficial foliage. He has been denied use of his real and personal property since the time of the Fire and has incurred costs to inspect, clean, repair, replant, and/or restore his real and personal property to its original condition.

199. The market value of his property has been significantly reduced.

200. Because of the Fire, Bethell has incurred costs and expenses necessary to secure and maintain alternative housing.

201. Bethell's economic losses are currently estimated as set forth in Exhibit A.

202. Bethell suffered severe smoke inhalation causing respiratory distress, coughing, sore eyes, sore throat and chronic lung and breathing problems because of smoke and ash from the Fire, for which he has received ongoing medical treatment. Bethel's mental and emotional distress was further aggravated because he lost two cats who died in the Fire, and because furniture, which was handmade by his father who died with Bethel was very young was also destroyed in the Fire.

203. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

204. Bethell's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Murray Booth

205. At the time of the Holiday Farm Fire, Murray Booth owned real and personal property located at 48011 McKenzie Highway, Vida, Oregon, and within the Holiday Farm Fire Area.

206. The Holiday Farm Fire destroyed Booth's real and personal property, including a home, various structures and outbuildings, a pump house and water well equipment, personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Booth has been denied use of the real and personal property since the time of the Fire and has incurred costs to inspect, clean, repair, replant, and/or restore the real and personal property to its original condition.

207. The market value of the property has been significantly reduced.

208. Because of the Fire, Booth has incurred costs and expenses necessary to secure and maintain alternative housing.

209. Booth's economic losses are currently estimated as set forth in Exhibit A.

210. Booth suffered respiratory distress, headaches and sore throats from inhaling smoke and ash from the Fire.

211. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

212. Booth's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Sara Booth

213. At the time of the Holiday Farm Fire, Sara Booth owned real and personal property located at 48011 McKenzie Highway, Vida, Oregon, and within the Holiday Farm Fire Area.

214. The Holiday Farm Fire destroyed Booth's real and personal property, including a home, various structures and outbuildings, a pump house and water well equipment, personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Booth has been denied use of the real and personal property since the time of the Fire and has incurred costs to inspect, clean, repair, replant, and/or restore the real and personal property to its original condition.

215. The market value of the property has been significantly reduced.

216. Because of the Fire, Booth has incurred costs and expenses necessary to secure and maintain alternative housing.

217. Booth's economic losses are currently estimated as set forth in Exhibit A.

218. Booth has also suffered respiratory distress, headaches and sore throats from inhaling smoke and ash from the Fire.

219. She has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

220. Booth's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Randy Borjesson

221. At the time of the Holiday Farm Fire, Randy Borjesson owned real and personal property located at 45904 McKenzie Highway, Vida, Oregon, and within the Holiday Farm Fire Area.

222. The Holiday Farm Fire destroyed Borjesson's real and personal property, and a

significant amount of timber, landscaping, decorative trees, and other beneficial foliage. He has been denied use of the described real and personal property since the time of the Fire, and has incurred costs to inspect, clean, repair, replant, and/or restore the real and personal property to its original condition.

223. The market value of the property has been significantly reduced.

224. Because of the Fire, Borjesson incurred costs and expenses necessary to secure and maintain alternative housing.

225. Borjesson's economic losses are currently estimated as set forth in Exhibit A.

226. Borjesson has also suffered respiratory distress, headaches, and sore throat because he inhaled smoke and ash from the Fire.

227. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire, including experiencing and witnessing his wife's seizures and eventual death as a result of the Fire.

228. Borjesson's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Cheryl Brandal

229. At the time of the Holiday Farm Fire, Cheryl Brandal resided at real property owned by Steve Shelcheck located at 45161 McKenzie Highway, space number 1, Leaburg, Oregon and within the Holiday Farm Fire Area. Brandal had a substantial amount of personal property at the residence.

230. The Holiday Farm Fire damaged or destroyed Brandal's personal property. She has been denied use of the described real and personal property since the time of the Fire, and has incurred costs to inspect, clean, repair, or replace her personal property to its original condition.

231. Because of the Fire, Brandal incurred costs and expenses necessary to secure and

maintain alternative housing.

232. Brandal's economic losses are currently estimated as set forth in Exhibit A.

Jeffery Brandal

233. At the time of the Holiday Farm Fire, Jeffery Brandal resided at real property owned by Steve Shelcheck located at 45161 McKenzie Highway, space number 1, Leaburg, Oregon and within the Holiday Farm Fire Area. Brandal had a substantial amount of personal property at the residence.

234. The Holiday Farm Fire damaged or destroyed Brandal's personal property. He has been denied use of the described real and personal property since the time of the Fire, and has incurred costs to inspect, clean, repair, or replace his personal property to its original condition.

235. Because of the Fire, Brandal incurred costs and expenses necessary to secure and maintain alternative housing.

236. Brandal's economic losses are currently estimated as set forth in Exhibit A.

Laura Brinn

237. At the time of the Holiday Farm Fire, Laura Brinn owned real and personal property located at 91303 Blue River Road, Blue River, Oregon and within the Holiday Farm Fire Area.

238. The Holiday Farm Fire destroyed Brinn's real and personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. She has been denied use of the described real and personal property since the time of the Fire, and has incurred costs to inspect, clean, repair, replant, and/or restore the real and personal property to its original condition.

239. The market value of the property has been significantly reduced.

240. Because of the Fire, Brinn has incurred costs and expenses necessary to secure and maintain alternative housing.

241. Brinn's economic losses are currently estimated as set forth in Exhibit A.

242. Laura Brinn suffered respiratory distress, headaches, and sore throats from smoke inhalation.

243. She has experienced stress, fear, inconvenience,, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

244. Brinn's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Brady Brooks

245. At the time of the Holiday Farm Fire, Brady Brooks lived and maintained personal property at 48808 McKenzie Highway, Vida, Oregon 97488 and within the Holiday Farm Fire Area.

246. The Holiday Farm Fire destroyed Brook's personal property, including a boat, kayaks, paddleboards, two trailers, chainsaws, weed eaters, power tools, and other personal property. Brooks has been denied use of the damaged or destroyed personal property since the time of the Fire, and has incurred costs to replace, inspect, clean, repair, and/or restore his personal property to its original condition.

247. Because of the Fire, Brooks has incurred costs and expenses necessary to secure and maintain alternative housing.

248. Brook's economic losses are currently estimated as set forth in Exhibit A.

Carollyn Broom

249. At the time of the Holiday Farm Fire, Carollyn Broom owned real and personal property located at 48517 McKenzie Highway, Vida, Oregon and within the Holiday Farm Fire Area.

250. The Holiday Farm Fire destroyed Broom's real and personal property, and a significant

amount of timber, landscaping, decorative trees, and other beneficial foliage. She has been denied use of the described real and personal property since the time of the Fire, and has incurred costs to inspect, clean, repair, replant, and/or restore her real and personal property to its original condition.

251. The market value of her property has been significantly reduced.

252. Because of the Fire, Broom incurred costs and expenses necessary to secure and maintain alternative housing.

253. Broom's economic losses are currently estimated as set forth in Exhibit A.

254. During the mandatory evacuation of her home, around 1:00 a.m. Carolynn Broom had to go to urgent care to replace her nebulizer machine due to difficulty breathing from the smoke and ash from the Fire. She also suffered cuts, bruises, headache, eye irritation and sinus problems from the smoke and ash.

255. She has experienced stress, fear, inconvenience,, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

256. Broom's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

James Leland Broom

257. At the time of the Holiday Farm Fire, Broom owned real and personal property located at 48517 McKenzie Highway, Vida, Oregon 97488 and within the Holiday Farm Fire Area.

258. The Holiday Farm Fire destroyed Broom's real and personal property, including his residence, two shops, a greenhouse, trees, bushes, and landscaping. Broom has been denied use of the damaged or destroyed real and personal property since the time of the Fire, and has incurred costs to replace, inspect, clean, repair, replant, and/or restore his real and personal property to its original

condition. The market value of his property has been significantly reduced.

259. Because of the Fire, Broom has incurred costs and expenses necessary to secure and maintain alternative housing.

260. Broom's economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

261. During mandatory evacuation around 1 a.m. Broom suffered from cuts, bruises, a headache, sore eyes, and sinus problems. The heavy smoke and ash caused Broom respiratory distress. Broom's heart problem worsened because of overexertion during the evacuation.

262. Broom has suffered stress, fear, anxiety, inconvenience, and emotional and mental distress because of the Holiday Farm Fire.

263. Broom's non-economic losses are currently estimated to not exceed the figure set forth in Exhibit A.

Edward Butler

264. At the time of the Holiday Farm Fire, Edward Butler resided at real property located at 45560 S. Gate Creek Road, Vida, Oregon, and within the Holiday Farm Fire Area pursuant to a rental contract with an option to purchase the property. He also had a substantial amount of personal property at the residence.

265. The Holiday Farm Fire destroyed the real property under purchase option and Butler's personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Butler has been denied use of the described real and personal property since the time of the Fire, will incur costs to inspect, clean, repair, replant, and/or restore his real and personal property to its original condition.

266. The market value of the real property under option has been significantly reduced. This reduction in value also reduced the equity Butler had accumulated through his lease-purchase option.

267. Butler's economic losses are currently estimated as set forth in Exhibit A.

268. Butler suffered smoke inhalation, coughing, difficulty breathing, sore throat, eye irritation, and headaches from smoke ash inhalation from the Fire. He also pulled muscles in his neck and shoulders, injured his ankle, and cut his lower left leg while evacuating. His lung problems are ongoing.

269. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries caused by the Holiday Farm Fire and is seeking mental health counseling for his emotional distress.

270. Butler's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Cassidy Campbell

271. At the time of the Holiday Farm Fire, Cassidy Campbell resided and maintained personal property at 46055 McKenzie Highway, Vida, Oregon 97488 and within the Holiday Farm Fire Area.

272. The Holiday Farm Fire destroyed Campbell's personal property. Campbell has been denied use of the damaged or destroyed personal property since the time of the Fire, and has incurred costs to inspect, replace, clean, repair, and/or restore the personal property to its original condition.

273. Because of the Fire, Campbell incurred costs and expenses necessary to secure and maintain alternative housing.

274. Campbell's economic losses are currently estimated as set forth in Exhibit A.

275. Campbell inhaled smoke and ash from the Fire causing respiratory distress, sore throat,

and headaches.

276. She has suffered stress, fear, inconvenience, anxiety, and emotional and mental distress because of the Holiday Farm Fire.

277. Campbell's non-economic losses are currently estimated to not exceed the figure set forth in Exhibit A.

Daniel Campbell

278. At the time of the Holiday Farm Fire, Daniel Campbell occupied a residence located on real property owned by Linda Douglas and owned personal property located within the residence, all at 46055 McKenzie Highway, Vida, Oregon and within the Holiday Farm Fire Area.

279. The Holiday Farm Fire destroyed the residence and Campbell's personal property. He has been denied use of the described real and personal property since the time of the Fire.

280. Because of the Fire, Campbell incurred costs and expenses necessary to secure and maintain alternative housing.

281. Campbell's economic losses are currently estimated as set forth in Exhibit A.

282. Campbell also suffered neck and back pain and muscle spasms from rushing to load up items from his home while trying to evacuate. He also suffered respiratory distress, headaches and sore throat from inhaling smoke and ash.

283. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

284. Campbell's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Jennifer Campbell

285. At the time of the Holiday Farm Fire, Jennifer Campbell occupied a residence located on real property owned by Linda Douglas and owned personal property located within the residence, all at 46055 McKenzie Highway, Vida, Oregon and within the Holiday Farm Fire Area.

286. The Holiday Farm Fire destroyed the residence and Campbell's personal property. She has been denied use of the described real and personal property since the time of the Fire.

287. Because of the Fire, Campbell has incurred costs and expenses necessary to secure and maintain alternative housing.

288. Campbell's economic losses are currently estimated as set forth in Exhibit A.

289. Campbell suffered respiratory distress, headaches and sore throat from smoke and ash inhalation, and neck and back pain and muscle spasms from rushing to load up items from her home while trying to evacuate.

290. She has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

291. Campbell's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Joan Campbell

292. At the time of the Holiday Farm Fire, Joan Campbell owned and occupied a residence located on real property and owned personal property located within the residence, all at 44531 McKenzie Highway, Leaburg, Oregon and within the Holiday Farm Fire Area.

293. The Holiday Farm Fire destroyed the residence and Campbell's personal property. She has been denied use of the described real and personal property since the time of the Fire.

294. The market value of her property has been significantly reduced.

295. Because of the Fire, Campbell= incurred costs and expenses necessary to secure and maintain alternative housing.

296. Campbell's economic losses are currently estimated as set forth in Exhibit A.

297. Campbell also suffered headaches, eye irritation and sore throats from inhaling smoke and ash.

298. She has experienced stress, fear, inconvenience,, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

299. Campbell's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Patrick G. Campbell

300. At the time of the Holiday Farm Fire, Patrick Campbell owned real and personal property located at 91260 Elk Creek Road, Vida, Oregon and within the Holiday Farm Fire Area.

301. The Holiday Farm Fire destroyed Campbell's real and personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. He has been denied use of the described real and personal property since the time of the Fire, and has incurred costs to inspect, clean, repair, replant, and/or restore his real and personal property to its original condition.

302. The market value of his property has been significantly reduced.

303. Because of the Fire, Campbell incurred costs and expenses necessary to secure and maintain alternative housing.

304. Campbell's economic losses are currently estimated as set forth in Exhibit A.

305. Campbell suffered smoke inhalation and had difficulty breathing during the heavy smoke and ash from the Fire. The heavy smoke and ash caused Campbell to suffer respiratory distress, sore

throat, and headaches.

306. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire. The fear and stress caused by the bodily injuries has aggravated Campbell's PTSD, including nightmares, insomnia, diminished appetite, physical exhaustion, and severe depression.

307. Campbell's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Robert Campbell

308. At the time of the Holiday Farm Fire, Robert Campbell owned real and personal property located at 46117 McKenzie Highway, Vida, Oregon, and within the Holiday Farm Fire Area.

309. The Holiday Farm Fire destroyed Campbell's real and personal property, including a home, various structures and outbuildings, personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. He has been denied use of his real and personal property since the time of the Fire and has incurred costs to inspect, clean, repair, replant, and/or restore the real and personal property to its original condition.

310. The market value of the property has been significantly reduced.

311. Because of the Fire, Campbell incurred costs and expenses necessary to secure and maintain alternative housing.

312. Campbell's economic losses are currently estimated as set forth in Exhibit A.

313. Campbell suffered respiratory distress, headaches, and sore throat from inhaling smoke and ash. His feet were injured while walking on hot gravel, and his skin and eyes were burned by the smoke. Campbell continues to suffer respiratory problems from the smoke and ash.

314. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

315. Campbell's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

James Canfield

316. At the time of the Holiday Farm Fire, James Canfield owned real and personal property located at 46025 Gate Creek Road, Vida, Oregon, and within the Holiday Farm Fire Area.

317. The Holiday Farm Fire destroyed Canfield's real and personal property, including a home, various structures and outbuildings, personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. He has been denied use of the real and personal property since the time of the Fire and has incurred costs to inspect, clean, repair, replant, and/or restore the real and personal property to its original condition.

318. The market value of the property has been significantly reduced.

319. Because of the Fire, Canfield incurred costs and expenses necessary to secure and maintain alternative housing.

320. Because of the stress and problems in the months after the Fire while living in an RV park, Canfield was unable to conduct his real estate business and surrendered his real estate license. Because of the Fire and its aftermath, Jim lost his real estate business and income.

321. After the Fire, he decided to travel with his wife to Idaho to flee the smoky environment and to improve his health. During the drive to Idaho, he struck an entire herd of mule deer, damaging his truck.

322. Canfield's economic losses are currently estimated as set forth in Exhibit A.

323. Canfield suffered eye irritation, respiratory problems, and sore throat from inhaling smoke and ash from the Fire. He now suffers from chronic respiratory and allergy problems from breathing the smoke and ash. His allergies and breathing are now significantly worse than at any time in the past.

324. Canfield has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

325. Canfield's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Sherrie Canfield

326. At the time of the Holiday Farm Fire, Sherrie Canfield owned real and personal property located at 46025 Gate Creek Road, Vida, Oregon, and within the Holiday Farm Fire Area.

327. The Holiday Farm Fire destroyed Canfield's real and personal property, including a home, various structures and outbuildings, personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. She has been denied use of the real and personal property since the time of the Fire and has incurred costs to inspect, clean, repair, replant, and/or restore the real and personal property to its original condition.

328. The market value of the property has been significantly reduced.

329. Because of the Fire, Canfield incurred costs and expenses necessary to secure and maintain alternative housing.

330. After the Fire, she decided to travel with her husband Jim to Idaho to flee the smoky environment and to improve her health. During the drive to Idaho, the vehicle struck an entire herd of mule deer, damaging the truck.

331. Canfield's economic losses are currently estimated as set forth in Exhibit A.

332. Canfield suffered eye irritation, respiratory problems, and sore throat from inhaling smoke and ash from the Fire.

333. She has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

334. Canfield's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Jamie Cervi-Skinner

335. At the time of the Holiday Farm Fire, Cervi-Skinner owned real and personal property located at 54432 McKenzie Highway, Lot #15, Blue River, Oregon 97413 and within the Holiday Farm Fire Area.

336. The Holiday Farm Fire destroyed Cervi-Skinner's real and personal property, destroying a picnic table, shed, tools, and land, and diminished Cervi-Skinner's ability to earn rental income from the property.

337. The market value of his property has been significantly reduced.

338. Cervi-Skinner's economic losses are currently estimated as set forth in Exhibit A.

Steven Cervi-Skinner

339. At the time of the Holiday Farm Fire, Steven Cervi-Skinner owned real and personal property located at 54432 McKenzie Highway, Lot #15 and within the Holiday Farm Fire Area.

340. The Holiday Farm Fire destroyed Cervi-Skinner's real and personal property, including a shed, personal property including tools, hoses, extension cords, and timber, landscaping, decorative trees, and other beneficial foliage. He has been denied use of his real and personal property since the

time of the Fire and has incurred costs to inspect, clean, repair, replant, and/or restore his real and personal property to its original condition.

341. The market value of his property has been significantly reduced.

342. Cervi-Skinner's economic losses are currently estimated as set forth in Exhibit A.

Codee Clark

343. At the time of the Holiday Farm Fire, Clark lived and maintained personal property at 52511 McKenzie Highway, Space 1, Blue River, Oregon 97413 and within the Holiday Farm Fire Area.

344. The Holiday Farm Fire destroyed Clark's personal property. Clark has been denied use of the described real and personal property since the time of the Fire, and has incurred costs to replace, inspect, clean, repair, and restore the personal property to its original condition.

345. Because of the Fire, Clark has incurred costs and expenses necessary to secure and maintain alternative housing.

346. Clark's economic losses are currently estimated as set forth in Exhibit A.

347. Clark inhaled smoke and ash from the Fire, causing respiratory distress, sore throat, and headaches.

348. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

349. Clark's non-economic losses are currently estimated to not exceed the figure set forth in Exhibit A.

Janelle Conner

350. At the time of the Holiday Farm Fire, Conner owned real and personal property located at 47555 McKenzie Highway, Vida, Oregon and within the Holiday Farm Fire Area.

351. The Holiday Farm Fire destroyed Conner's real and personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. She has been denied use of the described real and personal property since the time of the Fire, and has incurred costs to inspect, clean, repair, replant, and/or restore the real and personal property to its original condition.

352. The market value of the property has been significantly reduced.

353. Because of the Fire, Conner incurred costs and expenses necessary to secure and maintain alternative housing.

354. Conner's economic losses are currently estimated as set forth in Exhibit A.

355. Conner inhaled smoke and ash, causing respiratory distress, sore throat, headaches, wheezing, chemical conjunctivitis, oropharyngitis, and rhinorrhea.

356. She has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

357. Conner's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Kurt Conner

358. At the time of the Holiday Farm Fire, Kurt Conner owned real and personal property located at 47555 McKenzie Highway, Vida, Oregon and within the Holiday Farm Fire Area.

359. The Holiday Farm Fire destroyed Conner's real and personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. He has been denied use of the described real and personal property since the time of the Fire, and has incurred costs to inspect, clean, repair, replant, and/or restore his real and personal property to its original condition.

360. The market value of his property has been significantly reduced.

361. Because of the Fire, Conner incurred costs and expenses necessary to secure and maintain alternative housing.

362. Conner's economic losses are currently estimated as set forth in Exhibit A.

363. Conner inhaled smoke and ash from the Fire, causing him to suffer respiratory distress, chemical conjunctivitis, oropharyngitis, and rhinorrhea.

364. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

365. Conner's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Cheryl Courtnage

366. At the time of the Holiday Farm Fire, Cheryl Courtnage owned real and personal property located at 54400 Rainbow Drive, Blue River, Oregon, and within the Holiday Farm Fire Area.

367. The Holiday Farm Fire destroyed the Courtnage's real and personal property, including a home, various structures and outbuildings, personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Courtnage has been denied use of her real and personal property since the time of the Fire and has incurred costs to inspect, clean, repair, replant, and/or restore her real and personal property to its original condition.

368. The market value of her property has been significantly reduced.

369. Because of the Fire, Courtnage incurred costs and expenses necessary to secure and maintain alternative housing.

370. Courtnage's economic losses are currently estimated as set forth in Exhibit A.

John Courtnage

371. At the time of the Holiday Farm Fire, John Courtnage owned real and personal property located at 54400 Rainbow Drive, Blue River, Oregon, and within the Holiday Farm Fire Area.

372. The Holiday Farm Fire destroyed the Courtnage's real and personal property, including a home, various structures and outbuildings, personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Courtnage has been denied use of his real and personal property since the time of the Fire and has incurred costs to inspect, clean, repair, replant, and/or restore his real and personal property to its original condition.

373. The market value of his property has been significantly reduced.

374. Because of the Fire, Courtnage has incurred costs and expenses necessary to secure and maintain alternative housing.

375. Courtnage's economic losses are currently estimated as set forth in Exhibit A.

Cynthia Courtney

376. At the time of the Holiday Farm Fire, Cynthia Courtney leased real property owned by M&M Land and Cattle Co., LLC and owned personal property, all located at 52508 McKenzie Highway, Space #9, Blue River, Oregon, and within the Holiday Farm Fire Area.

377. The Holiday Farm Fire destroyed Courtney's personal property, including possessions and antiques obtained over four family generations, clothes, and other personal items. Courtney has been denied use of the described leased real property and her personal property since the time of the Fire.

378. Because of the Fire, Courtney incurred costs and expenses necessary to secure and maintain alternative housing.

379. Courtney's economic losses are currently estimated as set forth in Exhibit A.

380. Courtney inhaled smoke and ash from the Fire, causing her to suffer respiratory distress, headaches and sore throat.

381. She has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

382. Courtney's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Carleton Terence Coveny

383. At the time of the Holiday Farm Fire, Carleton Terence Coveny operated a property rental business and maintained personal property at real property owned by the Carleton T. Coveny Revocable Living Trust, all located at 55140 McKenzie River Drive, Blue River, Oregon.

384. Because of the Holiday Farm Fire, prospective property rentals were canceled, and Coveny's ability to attract and secure future rentals has been substantially diminished for the foreseeable future. The market value of the property and its value as a rental property has been significantly reduced.

385. Coveny's economic losses are currently estimated as set forth in Exhibit A.

Cox Family Trust - George Cox, trustee

386. At the time of the Holiday Farm Fire, The Cox Family Trust owned real and personal property located at 54432 McKenzie Highway, # 38, Blue River, Oregon, and within the Holiday Farm Fire Area.

387. The Holiday Farm Fire destroyed the Trust's real and personal property, including but not limited to a shed, water, and electrical hook-ups, a picnic table, timber, landscaping, decorative trees, and other beneficial foliage. The Trust has been denied use of the real and personal property since the

time of the Fire and has incurred costs to inspect, clean, repair, replant, and/or restore the real and personal property to its original condition.

388. The market value of the property has been significantly reduced.

389. Because of the Fire, the Trust incurred costs and expenses necessary to secure and maintain alternative housing.

390. The Trust's economic losses are currently estimated as set forth in Exhibit A.

Alan Curry

391. At the time of the Holiday Farm Fire, Alan Curry resided at real property owned by Margo Barranti located at 45457 McKenzie Highway, Leaburg, Oregon, and within the Holiday Farm Fire Area. Curry had a substantial amount of personal property at the residence.

392. The Holiday Farm Fire damaged or destroyed Curry's personal property and denied him the use and his right to occupy the described real personal property since the time of the Fire.

393. Because of the Fire, Curry incurred costs and expenses necessary to secure and maintain alternative housing.

394. Curry's economic losses are currently estimated as set forth in Exhibit A.

395. Curry has also suffered smoke inhalation, eye irritation, headaches from the smoke, and has a continuing fear of being injured from falling trees on the property damaged in the Fire.

396. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, risks, and losses caused by the Holiday Farm Fire.

397. Curry's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Shelia Dahl

398. At the time of the Holiday Farm Fire, Dahl owned real and personal property located at 90166 Gale Creek Road, Vida, Oregon 97488 and within the Holiday Farm Fire Area.

399. The Holiday Farm Fire destroyed Dahl's real and personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. She has been denied use of the described real and personal property since the time of the Fire, and has incurred costs to inspect, clean, repair, replant, and/or restore his real and personal property to its original condition.

400. The market value of her property has been significantly reduced.

401. Because of the Fire, Dahl has incurred costs and expenses necessary to secure and maintain alternative housing.

402. Dahl's economic losses are currently estimated as set forth in Exhibit A.

Chris DeLeon

403. At the time of the Holiday Farm Fire, Chris DeLeon owned real and personal property located at 45667 McKenzie Highway, Vida, Oregon, and within the Holiday Farm Fire Area.

404. The property contained both residences, structures, and a finished barn that served as a venue for a wedding and event services business owned by Chris DeLeon and his spouse.

405. The Holiday Farm Fire destroyed a significant amount of timber, landscaping, decorative trees, and other beneficial foliage and substantially reduced the ability of DeLeon to use the property, or to lease the property for weddings and other events. DeLeon has been partially denied use of the real and personal property since the time of the Fire and has incurred costs to inspect, clean, repair, replant, and/or restore the real and personal property to its original condition.

406. The market value of the property has been significantly reduced.

407. Because of the Fire, DeLeon incurred costs and expenses necessary to secure and

maintain alternative housing.

408. DeLeon's economic losses are currently estimated as set forth in Exhibit A.

409. DeLeon has also suffered respiratory distress, headaches, sore scratchy throats, and shortness of breath from inhaling smoke and ash caused by the Fire.

410. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

411. DeLeon's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Leian DeLeon

412. At the time of the Holiday Farm Fire, Leian DeLeon owned real and personal property located at 45667 McKenzie Highway, Vida, Oregon, and within the Holiday Farm Fire Area.

413. The property contained both residences, structures, and a finished barn that served as a venue for a wedding and event services business owned by Leian DeLeon and her spouse.

414. The Holiday Farm Fire destroyed a significant amount of timber, landscaping, decorative trees, and other beneficial foliage and substantially reduced the ability of DeLeon to use the property, or to lease the property for weddings and other events. She has been partially denied use of the real and personal property since the time of the Fire and has incurred costs to inspect, clean, repair, replant, and/or restore the real and personal property to its original condition.

415. The market value of the property has been significantly reduced.

416. Because of the Fire, DeLeon incurred costs and expenses necessary to secure and maintain alternative housing.

417. DeLeon's economic losses are currently estimated as set forth in Exhibit A.

418. DeLeon has also suffered respiratory distress, headaches, sore scratchy throats, and shortness of breath from inhaling smoke and ash caused by the Fire.

419. She has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

420. DeLeon's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Linda Douglas

421. At the time of the Holiday Farm Fire, Linda Douglas owned real and personal property located at 46055 McKenzie Highway, Vida, Oregon and within the Holiday Farm Fire Area.

422. The Holiday Farm Fire destroyed Douglas's real and personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. She has been denied use of the described real and personal property since the time of the Fire, and has incurred costs to inspect, clean, repair, replant, and/or restore the real and personal property to its original condition.

423. The market value of his property has been significantly reduced.

424. Because of the Fire, Douglas incurred costs and expenses necessary to secure and maintain alternative housing.

425. Douglas's economic losses are currently estimated as set forth in Exhibit A.

426. Douglas also inhaled smoke and ash causing her to suffer respiratory distress, headaches, eye irritation and throat pain since returning to her property after the Fire.

427. She has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

428. Douglas's non-economic losses are currently estimated not to exceed the figure set forth

in Exhibit A.

Deborah Eason

429. At the time of the Holiday Farm Fire, Eason resided and maintained personal property at 50463 McKenzie Highway, Vida, Oregon 97488 and within the Holiday Farm Fire Area.

430. The Holiday Farm Fire destroyed Eason's personal property. Eason has been denied use of her personal property since the time of the Fire, and has incurred costs to replace, clean, repair, and/or restore it to its original condition.

431. Because of the Fire, Eason has incurred costs and expenses necessary to secure and maintain alternative housing.

432. Eason's economic losses are currently estimated as set forth in Exhibit A.

433. Eason inhaled significant amounts of smoke and ash from the Fire that caused respiratory distress, anxiety, shortness of breath, and headaches.

434. She has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

435. Eason's non-economic losses are currently estimated to not exceed the figure set forth in Exhibit A.

Christine Elersich

436. At the time of the Holiday Farm Fire, Elersich owned real and personal property located at 46979 Goodpasture Road, Vida, Oregon 97488 and within the Holiday Farm Fire Area.

437. The Holiday Farm Fire destroyed Elersich's real and personal property, including her home, a 1966 Chevelle, 2000 Harley Davidson motorcycle, 2019 Audi, Alumaweld drift boat and trailer, 1991 F150, other personal property onsite, and a significant amount of timber, landscaping,

decorative trees, and other beneficial foliage. Elersich has been denied use of the damaged or destroyed real and personal property since the time of the Fire, and has incurred costs to replace, inspect, clean, repair, replant, and/or restore her real and personal property to its original condition. Do date, Elersich has been unable to rebuild a livable structure on the property.

438. The market value of her property has been significantly reduced.

439. Because of the Fire and the inability to rebuild a livable structure on the property, Elersich has incurred costs and expenses necessary to secure and maintain alternative housing.

440. Elersich's economic losses are currently estimated as set forth in Exhibit A.

441. Elersich inhaled a significant amount of smoke and ash from the Fire. The smoke and ash caused her respiratory distress, sore throat, and headaches.

442. She has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

443. Elersich's non-economic losses are currently estimated to not exceed the figure set forth in Exhibit A.

Chris Erdahl

444. At the time of the Holiday Farm Fire, Chris Erdahl owned real and personal property located at 45828 North Gate Creek Road, Vida, Oregon, and within the Holiday Farm Fire Area.

445. The Holiday Farm Fire destroyed Erdahl's real and personal property, including a home, various structures and outbuildings, other personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Erdahl has been denied use of his real and personal property since the time of the Fire and has incurred costs to inspect, clean, repair, replant, and/or restore his real and personal property to its original condition. The market value of his property

has been significantly reduced.

446. Erdahl's economic losses are currently estimated as set forth in Exhibit A.

Jodi Erdahl

447. At the time of the Holiday Farm Fire, Jodi Erdahl owned real and personal property located at 45828 North Gate Creek Road, Vida, Oregon, and within the Holiday Farm Fire Area.

448. The Holiday Farm Fire destroyed Erdahl's real and personal property, including a home, various structures and outbuildings, other personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Erdahl has been denied use of her real and personal property since the time of the Fire and has incurred costs to inspect, clean, repair, replant, and/or restore her real and personal property to its original condition.

449. The market value of her property has been significantly reduced.

450. Because of the Fire, Erdahl has incurred costs and expenses necessary to secure and maintain alternative housing.

451. Erdahl's economic losses are currently estimated as set forth in Exhibit A.

Jeanne Fager

452. At the time of the Holiday Farm Fire, Jeanne Fager owned real and personal property located at 54380 McKenzie River Drive, Blue River, Oregon, and within the Holiday Farm Fire Area.

453. The Holiday Farm Fire destroyed Fager's real and personal property, including a home, various structures and outbuildings, water well equipment, personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Fager has been denied use of her real and personal property since the time of the Fire and has incurred costs to inspect, clean, repair, replant, and/or restore her real and personal property to its original condition.

454. The market value of her property has been significantly reduced.

455. Because of the Fire, Fager incurred costs and expenses necessary to secure and maintain alternative housing.

456. Fager's economic losses are currently estimated as set forth in Exhibit A.

Gary Fair

457. At the time of the Holiday Farm Fire, Gary Fair resided at real property owned by Charlotte Archer located at 90197 Gale Creek Road, Vida, Oregon, and within the Holiday Farm Fire Area. He had a substantial amount of personal property, including tools and business-related property at the residence.

458. The Holiday Farm Fire destroyed Fair's personal property and denied him the use and his right to occupy the described real personal property after the Fire.

459. Because of the Fire, Fair incurred costs and expenses necessary to secure and maintain alternative housing.

460. Fair's economic losses are currently estimated as set forth in Exhibit A.

461. Fair suffered respiratory distress, headaches and sore throat from inhaling smoke and ash.

462. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

463. Fair's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Merrick Firestone

464. At the time of the Holiday Farm Fire, Merrick Firestone occupied a residence and maintained personal property at 91261 Blue River Road, Blue River, Oregon and within the Holiday

Farm Fire Area.

465. Firestone's personal property was damaged or destroyed in the Fire. He was also denied use of the real and personal property for a time after the Fire.

466. Because of the Fire, Firestone incurred costs and expenses necessary to secure and maintain alternative housing.

467. Firestone's economic losses are currently estimated as set forth in Exhibit A.

468. Firestone inhaled smoke and ash from the Fire, causing respiratory irritation, coughing, sore eyes and throat, and other associated injuries.

469. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

470. Firestone's non-economic damages are currently estimated to not exceed the figure set forth in Exhibit A.

Monica Firestone

471. At the time of the Holiday Farm Fire, Monica Firestone occupied a residence and maintained personal property at 91261 Blue River Road, Blue River, Oregon and within the Holiday Farm Fire Area.

472. Firestone's personal property was damaged or destroyed in the Fire. She was also denied use of the real and personal property for a time after the Fire.

473. Because of the Fire, Firestone incurred costs and expenses necessary to secure and maintain alternative housing.

474. Firestone's economic losses are currently estimated as set forth in Exhibit A.

475. Firestone inhaled smoke and ash, causing respiratory irritation, coughing, sore eyes and

throat, and other associated injuries.

476. She has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

477. Firestone's non-economic damages are currently estimated to not exceed the figure set forth in Exhibit A.

Jim Fitzgerald

478. At the time of the Holiday Farm Fire, Fitzgerald owned real and personal property located at 46437 McKenzie Highway, Vida, Oregon 97488 and within the Holiday Farm Fire Area.

479. The Holiday Farm Fire destroyed Fitzgerald's real and personal property, damaged his business, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Fitzgerald has been denied use of the damaged or destroyed real and personal property since the time of the Fire, and has incurred costs to replace, inspect, clean, repair, replant, and/or restore his real and personal property to its original condition.

480. The market value of his property has been significantly reduced.

481. Because of the Fire, Fitzgerald has incurred costs and expenses necessary to secure and maintain alternative housing.

482. Fitzgerald's economic losses are currently estimated to total the figure set forth in Exhibit A.

483. Fitzgerald inhaled smoke and ash, causing respiratory distress, sore throat, headaches, and difficulty breathing.

484. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

485. Fitzgerald's non-economic losses are currently estimated to not exceed the figure set forth in Exhibit A.

Gene Thomas Flint

486. At the time of the Holiday Farm Fire, Flint owned real and personal property located at 91271 Blue River Road, Blue River, Oregon 97413 and within the Holiday Farm Fire Area.

487. The Holiday Farm Fire destroyed Flint's real and personal property, including his home, woodshed, storage shed, deck, trailers, truck, two motorcycles, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Flint has been denied use of the damaged or destroyed real and personal property since the time of the Fire, and has incurred costs to replace, inspect, clean, repair, replant, and/or restore his real and personal property to its original condition.

488. The market value of his property has been significantly reduced.

489. Because of the Fire, Flint has incurred costs and expenses necessary to secure and maintain alternative housing.

490. Flint's economic losses are currently estimated as set forth in Exhibit A.

491. Flint inhaled smoke and ash, causing respiratory distress, sore throat, headaches, and difficulty breathing.

492. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

493. Flint's non-economic losses are currently estimated to not exceed the figure set forth in Exhibit A.

Tracy Forrest

494. At the time of the Holiday Farm Fire, Tracy Forrest occupied real property and

maintained personal property at a residence owned by the Helen A. Hutchinson Living Trust located at 47015 Goodpasture Road, Vida, Oregon, and within the Holiday Farm Fire Area.

495. The Holiday Farm Fire destroyed Forrest's personal property, and Forrest has been denied use of the described real and personal property since the time of the Fire.

496. Because of the Fire, Forrest incurred costs and expenses necessary to secure and maintain alternative housing.

497. Forrest's economic losses are currently estimated as set forth in Exhibit A.

498. Forrest inhaled smoke and ash causing headaches, sore throat, and sinus problems.

499. Forrest experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

500. Forrest's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Quenton Fraser

501. At the time of the Holiday Farm Fire, Quenton Fraser owned real and personal property located at 48065 McKenzie Highway, Vida, Oregon, and within the Holiday Farm Fire Area.

502. The Holiday Farm Fire destroyed Fraser's real and personal property, including five structures consisting of a home, two sheds, a greenhouse, and a cargo container storage shed, personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Fraser has been denied use of his real and personal property since the time of the Fire and has incurred costs to inspect, clean, repair, replant, and/or restore his real and personal property to its original condition.

503. The market value of his property has been significantly reduced.

504. Because of the Fire, Fraser incurred costs and expenses necessary to secure and maintain alternative housing.

505. Fraser's economic losses are currently estimated as set forth in Exhibit A.

506. Fraser inhaled smoke and ash from the Fire, causing headaches, breathing issues, and sore throat.

507. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

508. Fraser's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Marsha Gabbard

509. At the time of the Holiday Farm Fire, Marsha Gabbard owned real and personal property located at 45763 Goodpasture Road, Vida, Oregon and within the Holiday Farm Fire Area.

510. The Holiday Farm Fire destroyed Gabbard's real and personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Gabbard has been denied use of the described real and personal property since the time of the Fire, and has incurred costs to inspect, clean, repair, replant, and/or restore the real and personal property to its original condition.

511. The market value of the property has been significantly reduced.

512. Because of the Fire, Gabbard incurred costs and expenses necessary to secure and maintain alternative housing.

513. Gabbard's economic losses are currently estimated as set forth in Exhibit A.

514. Gabbard also inhaled smoke and ash from the Fire, causing sore throat, labored breathing, pain and a burning sensation in her eyes, headaches, migraines, stomach pain, insomnia, depression,

and anxiety.

515. She has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

516. Gabbard's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Sonny Gabbard

517. At the time of the Holiday Farm Fire, Sonny Gabbard owned real and personal property located at 45763 Goodpasture Road, Vida, Oregon and within the Holiday Farm Fire Area.

518. The Holiday Farm Fire destroyed Sonny Gabbard real and personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Sonny Gabbard has been denied use of the described real and personal property since the time of the Fire, and has incurred costs to inspect, clean, repair, replant, and/or restore the real and personal property to its original condition.

519. The market value of the property has been significantly reduced.

520. Because of the Fire, Gabbard incurred costs and expenses necessary to secure and maintain alternative housing.

521. Gabbard's economic losses are currently estimated as set forth in Exhibit A.

522. Gabbard also inhaled smoke and ash from the Fire, causing sore throat, labored breathing, pain and a burning sensation in his eyes, headaches, migraines, stomach pain, and insomnia.

523. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

524. Sonny Gabbard non-economic losses are currently estimated not to exceed the figure set

forth in Exhibit A.

Elizabeth Gabriel

525. At the time of the Holiday Farm Fire, Gabriel owned real and personal property located at 91286 Blue River Road, Blue River, Oregon and within the Holiday Farm Fire Area.

526. The Holiday Farm Fire destroyed Gabriel's real and personal property, including her home, guest studio, barn, two garden sheds, and damaged carports, trees, and landscaping. Gabriel has been denied use of the damaged or destroyed real and personal property since the time of the Fire, and has incurred costs to replace, inspect, clean, repair, replant, and/or restore his real and personal property to its original condition.

527. The market value of her property has been significantly reduced.

528. Because of the Fire, Gabriel has incurred costs and expenses necessary to secure and maintain alternative housing.

529. Gabriel's economic losses are currently estimated as set forth in Exhibit A.

530. Gabriel inhaled smoke and ash, causing respiratory distress, sore throat, headaches, and difficulty breathing.

531. She has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

532. Gabriel's non-economic losses are currently estimated to not exceed the figure set forth in Exhibit A.

Steve Gabriel

533. At the time of the Holiday Farm Fire, Gabriel owned real and personal property located at 91286 Blue River Road, Blue River, Oregon and within the Holiday Farm Fire Area.

534. The Holiday Farm Fire destroyed Gabriel's real and personal property, including his home, guest studio, barn, two garden sheds, and damaged carports, trees, and landscaping. Gabriel has been denied use of the damaged or destroyed real and personal property since the time of the Fire, and has incurred costs to replace, inspect, clean, repair, replant, and/or restore his real and personal property to its original condition.

535. The market value of his property has been significantly reduced.

536. Because of the Fire, Gabriel has incurred costs and expenses necessary to secure and maintain alternative housing.

537. Gabriel's economic losses are currently estimated as set forth in Exhibit A.

538. Gabriel inhaled smoke and ash, causing respiratory distress, sore throat, headaches, and difficulty breathing.

539. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

540. Gabriel's non-economic losses are currently estimated to not exceed the figure set forth in Exhibit A.

Nailah Garner

541. At the time of the Holiday Farm Fire, Nailah Garner resided at real property located at 45560 S. Gate Creek Road, Vida, Oregon, and within the Holiday Farm Fire Area pursuant to a rental contract with an option to purchase the property. She also had a substantial amount of personal property at the residence.

542. The Holiday Farm Fire destroyed the real property under purchase option and Garner's personal property, and a significant amount of timber, landscaping, decorative trees, and other

beneficial foliage. Garner has been denied use of the described real and personal property since the time of the Fire, will incur costs to inspect, clean, repair, replant, and/or restore the real and personal property to its original condition.

543. The market value of the real property under option has been significantly diminished. This reduction in value also reduced the equity Garner had accumulated through her lease-purchase option.

544. Because of the Fire, Garner incurred costs and expenses necessary to secure and maintain alternative housing.

545. Garner's economic losses are currently estimated as set forth in Exhibit A.

546. Garner inhaled smoke and ash from the Fire, cause coughing, difficulty breathing, eye pain, stomach pain, nausea/vomiting, and insomnia. She also hit her head and pulled muscles while evacuating from the Fire.

547. She has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

548. Garner's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Elnara Gasanova

549. At the time of the Holiday Farm Fire, Gasanova owned and maintained personal property located at 50233 McKenzie Highway, Vida, Oregon 97488 and within the Holiday Farm Fire Area.

550. The Holiday Farm Fire destroyed Gasanova's personal property. She has been denied use of the damaged or destroyed personal property since the time of the Fire, and has incurred costs to replace, inspect, clean, repair, replant, and/or restore her personal property to its original condition.

551. Because of the Fire, Gasanova has incurred costs and expenses necessary to secure and maintain alternative housing.

552. Gasanova's economic losses are currently estimated as set forth in Exhibit A.

553. Gasanova inhaled smoke and ash from the Fire, causing difficulty breathing, respiratory distress, sore throat, and headaches.

554. She has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

555. Gasanova's non-economic losses are currently estimated to not exceed the figure set forth in Exhibit A.

Ryan Gibson

556. At the time of the Holiday Farm Fire, Gibson resided and maintained personal property at 53205 McKenzie Highway, Blue River, Oregon 97413 and within the Holiday Farm Fire Area.

557. The Holiday Farm Fire destroyed Gibson's personal property, including a 2002 pickup, chainsaws, tools, entertainment systems, nine firearms and ammunition. Gibson has been denied use of the damaged or destroyed personal property since the time of the Fire, and has incurred costs to replace, inspect, clean, repair, , and/or restore his personal property to its original condition.

558. Because of the Fire, Gibson has incurred costs and expenses necessary to secure and maintain alternative housing.

559. Gibson has also lost income because of the Fire and its aftermath.

560. Gibson's economic losses are currently estimated as set forth in Exhibit A.

Margaret Godfrey

561. At the time of the Holiday Farm Fire, Godfrey resided and maintained personal property

located at 52435 McKenzie Highway, Blue River, Oregon, 97413 and within the Holiday Farm Fire Area.

562. The Holiday Farm Fire destroyed Godfrey's property. Godfrey has been denied use of the damaged or destroyed personal property since the time of the Fire, and has incurred costs to replace, inspect, clean, repair, and/or restore her personal property to its original condition.

563. Because of the Fire, Godfrey has incurred costs and expenses necessary to secure and maintain alternative housing.

564. Godfrey's economic losses are currently estimated as set forth in Exhibit A.

565. Godfrey inhaled smoke and ash from the Fire causing respiratory distress, sore throat, and sinus issues.

566. She has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

567. Godfrey's non-economic losses are currently estimated to not exceed the figure set forth in Exhibit A.

Michael Godfrey

568. At the time of the Holiday Farm Fire, Godfrey resided and maintained personal property located at 52435 McKenzie Highway, Blue River, Oregon, 97413 and within the Holiday Farm Fire Area.

569. The Holiday Farm Fire destroyed Godfrey's property. Godfrey has been denied use of the damaged or destroyed personal property since the time of the Fire, and has incurred costs to replace, inspect, clean, repair, and/or restore his personal property to its original condition.

570. Because of the Fire, Godfrey has incurred costs and expenses necessary to secure and

maintain alternative housing.

571. Godfrey's economic losses are currently estimated as set forth in Exhibit A.

572. Godfrey inhaled smoke and ash causing respiratory distress, sore throat, and sinus issues.

573. He has suffered stress, fear, anxiety, inconvenience, and emotional and mental distress because of the Holiday Farm Fire.

574. Godfrey's non-economic losses are currently estimated to not exceed the figure set forth in Exhibit A.

Elaine Godsy

575. At the time of the Holiday Farm Fire, Godsy owned real and personal property located at 90231 Cascade View Drive, Vida, Oregon 97488 and within the Holiday Farm Fire Area.

576. The Holiday Farm Fire destroyed Godsy's real and personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Godsy has been denied use of the damaged or destroyed real and personal property since the time of the Fire, and has incurred costs to replace, inspect, clean, repair, replant, and/or restore her real and personal property to its original condition. The market value of her property has been significantly reduced.

577. Because of the Fire, Godsy has incurred costs and expenses necessary to secure and maintain alternative housing.

578. Godsy's economic losses are currently estimated as set forth in Exhibit A.

579. Godsy inhaled smoke and ash causing respiratory distress, sore throat, and headaches.

580. She has suffered stress, fear, inconvenience, anxiety, and emotional and mental distress because of the Holiday Farm Fire.

581. Godsy's non-economic losses are currently estimated to not exceed the figure set forth in

Exhibit A.

Richard Godsy

582. At the time of the Holiday Farm Fire, Godsy owned real and personal property located at 90231 Cascade View Drive, Vida, Oregon 97488 and within the Holiday Farm Fire Area.

583. The Holiday Farm Fire destroyed Godsy's real and personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Godsy has been denied use of the damaged or destroyed real and personal property since the time of the Fire, and has incurred costs to replace, inspect, clean, repair, replant, and/or restore his real and personal property to its original condition.

584. The market value of his property has been significantly reduced.

585. Because of the Fire, Godsy has incurred costs and expenses necessary to secure and maintain alternative housing.

586. Godsy's economic losses are currently estimated as set forth in Exhibit A.

587. Godsy inhaled smoke and ash causing respiratory distress, sore throat, and headaches.

588. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

589. Godsy's non-economic losses are currently estimated to not exceed the figure set forth in Exhibit A.

Geff Edward Gravitt

590. At the time of the Holiday Farm Fire, Geff Gravitt owned real and personal property located at 49752 McKenzie Highway, Vida, Oregon and within the Holiday Farm Fire Area.

591. The Holiday Farm Fire destroyed Gravitt's real and personal property, and a significant

amount of timber, landscaping, decorative trees, and other beneficial foliage. He has been denied use of the described real and personal property since the time of the Fire, and has incurred costs to inspect, clean, repair, replant, and/or restore his real and personal property to its original condition.

592. The market value of his property has been significantly reduced.

593. Because of the Fire, Gravitt incurred costs and expenses necessary to secure and maintain alternative housing.

594. Gravitt's economic losses are currently estimated as set forth in Exhibit A.

595. Gravitt inhaled heavy smoke and ash from the Fire, causing his pre-existing asthma to worsen and caused him to respiratory distress, headaches, and sore throat. Gravitt's wife of 34 years died on March 19, 2021 after becoming extremely depressed about losing her home and possessions in the Fire and couldn't attend her doctor's appointments for treatment because the Fire destroyed the Gravitts' car. The Fire also destroyed the cell towers so she couldn't have phone appointments with her doctors.

596. He has experienced stress, fear, inconvenience, and emotional and mental distress because of his bodily injuries, damages, and losses caused by the Holiday Farm Fire.

597. Gravitt's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Geff Gravitt, II

598. At the time of the Holiday Farm Fire, Gravitt resided and maintained personal property at 49752 McKenzie Highway, Vida, Oregon 97488 and within the Holiday Farm Fire Area.

599. The Holiday Farm Fire destroyed all of Gravitt's personal property and belongings, including his clothing, beer brewing equipment, electronics, musical instruments, bicycle, weapons,

and toiletries. Gravitt has been denied use of the damaged or destroyed personal property since the time of the Fire, and has incurred costs to inspect, replace, clean, repair, and/or restore his personal property to its original condition.

600. Because of the Fire, Gravitt incurred costs and expenses necessary to secure and maintain alternative housing.

601. Gravitt's economic losses are currently estimated as set forth in Exhibit A.

602. Gravitt suffered from scrapes, bruises, headaches, respiratory issues, and trouble breathing when he had to sift through the Fire rubble, causing him significant respiratory distress for five days. He had muscle strain, sore throat, and sinus problems, all from exposure and inhaling smoke and ash from the Fire.

603. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

604. Gravitt's non-economic losses are currently estimated to not exceed the figure set forth in Exhibit A.

Anabella Greb

605. At the time of the Holiday Farm Fire, Greb owned real and personal property located at 47408 McKenzie Highway, Vida, Oregon 97488 and within the Holiday Farm Fire Area.

606. The Holiday Farm Fire destroyed Greb's real and personal property, including two houses. Greb has been denied use of the damaged or destroyed real and personal property since the time of the Fire, and has incurred costs to replace, inspect, clean, repair, replant, and/or restore her real and personal property to its original condition.

607. The market value of her property has been significantly reduced.

608. Because of the Fire, Greb has incurred costs and expenses necessary to secure and maintain alternative housing.

609. Greb's economic losses are currently estimated as set forth in Exhibit A.

610. Greb inhaled smoke and ash, causing respiratory distress, sore throat, headaches, and difficulty breathing.

611. She has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

612. Greb's non-economic losses are currently estimated to not exceed the figure set forth in Exhibit A.

George Greb

613. At the time of the Holiday Farm Fire, Greb owned real and personal property located at 47408 McKenzie Highway, Vida, Oregon 97488 and within the Holiday Farm Fire Area.

614. The Holiday Farm Fire destroyed Greb's real and personal property, including two houses. Greb has been denied use of the damaged or destroyed real and personal property since the time of the Fire, and has incurred costs to replace, inspect, clean, repair, replant, and/or restore his real and personal property to its original condition.

615. The market value of his property has been significantly reduced.

616. Because of the Fire, Greb has incurred costs and expenses necessary to secure and maintain alternative housing.

617. Greb's economic losses are currently estimated as set forth in Exhibit A.

618. Greb inhaled smoke and ash, causing respiratory distress, sore throat, headaches, and difficulty breathing.

619. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

620. Greb's non-economic losses are currently estimated to not exceed the figure set forth in Exhibit A.

Emily Gumpert

621. At the time of the Holiday Farm Fire, Gumpert resided and maintained personal property at 45542 Good Pasture Road, Vida, Oregon 97488 and within the Holiday Farm Fire Area.

622. The Holiday Farm Fire destroyed Gumpert's personal property. Gumpert has been denied use of the damaged or destroyed personal property since the time of the Fire, and has incurred costs to inspect, replace, clean, repair, and/or restore her personal property to its original condition.

623. Because of the Fire, Gumpert has incurred costs and expenses necessary to secure and maintain alternative housing.

624. Gumpert's economic losses are currently estimated as set forth in Exhibit A.

625. Gumpert inhaled smoke and ash causing respiratory distress, headaches, and upset stomach.

626. She has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

627. Gumpert's non-economic losses are currently estimated to not exceed the figure set forth in Exhibit A.

Lesa Henson

628. At the time of the Holiday Farm Fire, Henson owned real and personal property located at 50233 McKenzie Highway, Vida, Oregon 97488 and within the Holiday Farm Fire Area.

629. The Holiday Farm Fire destroyed Henson's real and personal property, including her residence, emotional support dog, personal belongings, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Henson has been denied use of the damaged or destroyed real and personal property since the time of the Fire, and has incurred costs to replace, inspect, clean, repair, replant, and/or restore her real and personal property to its original condition.

630. The market value of her property has been significantly reduced.

631. Because of the Fire, Henson has incurred costs and expenses necessary to secure and maintain alternative housing.

632. Henson's economic losses are currently estimated as set forth in Exhibit A.

633. Henson inhaled smoke and ash causing respiratory distress, sore throat, cough, and headaches. She received physical injuries from cleanup and inspection of her property that required a visit to emergency room.

634. She has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

635. She has experienced severe and ongoing emotional and mental distress, anxiety, substantial worsening of and marked increase in post-traumatic stress disorder requiring an increased amount of counseling, experienced severe effects on cognitive abilities and executive function. Henson is currently seeking long term care at the Veterans Administration to treat her injuries and cognitive decline. All of Henson's emotional and mental distress detailed above was a result of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

636. Henson's non-economic losses are currently estimated to not exceed the figure set forth in Exhibit A.

Douglas Hickman

637. At the time of the Holiday Farm Fire, Hickman owned real and personal property located at 45369 and 45379 McKenzie Highway, Leaburg, Oregon 97489 and within the Holiday Farm Fire Area.

638. The Holiday Farm Fire destroyed Hickman's real and personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Hickman has been denied use of the damaged or destroyed real and personal property since the time of the Fire, and has incurred costs to replace, inspect, clean, repair, replant, and/or restore his/her real and personal property to its original condition.

639. The market value of his property has been significantly reduced.

640. Hickman's economic losses are currently estimated as set forth in Exhibit A.

641. Hickman inhaled smoke and ash from the Fire, causing respiratory distress, sore throat, and headaches.

642. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

643. Hickman's non-economic losses are currently estimated to not exceed the figure set forth in Exhibit A.

Eric Hickman

644. At the time of the Holiday Farm Fire, Hickman owned personal property located at 54369 and 54379 McKenzie Highway, Leaburg, Oregon, 97489 and within the Holiday Farm Fire Area.

645. The Holiday Farm Fire destroyed Hickman's personal property, including a Cadillac CTX, VW Jetta, Honda Shadow VTX 1100, Suzuki GSXR 1000, Sea-Doo SPX, 2 dirt bikes, guitars,

and firearms.

646. Hickman has been denied use of the damaged or destroyed real and personal property since the time of the Fire, and has incurred costs to replace, inspect, clean, repair, and/or restore his personal property to its original condition.

647. Because of the Fire, Hickman has incurred costs and expenses necessary to secure and maintain alternative housing.

648. Hickman's economic losses are currently estimated as set forth in Exhibit A.

Jacklyn Hoffman

649. At the time of the Holiday Farm Fire, Hoffman owned real and personal property located at 52511 McKenzie Highway, #20, Blue River, Oregon 97413 and within the Holiday Farm Fire Area.

650. The Holiday Farm Fire destroyed Hoffman's real and personal property, mobile home and four sheds.

651. Hoffman has been denied use of the damaged or destroyed real and personal property since the time of the Fire, and has incurred costs to replace, inspect, clean, repair, replant, and/or restore her real and personal property to its original condition.

652. The market value of her property has been significantly reduced.

653. Because of the Fire, Hoffman has incurred costs and expenses necessary to secure and maintain alternative housing.

654. Hoffman's economic losses are currently estimated as set forth in Exhibit A.

Heather Hogan

655. At the time of the Holiday Farm Fire, Hogan resided and maintained personal property at 48808 McKenzie Highway, Vida, Oregon 97488 and within the Holiday Farm Fire Area.

656. The Holiday Farm Fire destroyed Hogan's personal property, including a popup camper trailer, electronics, and all contents of the home. Hogan has been denied use of the damaged or destroyed personal property since the time of the Fire, and has incurred costs to inspect, replace, clean, repair, and/or restore her personal property to its original condition.

657. Because of the Fire, Hogan has incurred costs and expenses necessary to secure and maintain alternative housing.

658. Hogan's economic losses are currently estimated as set forth in Exhibit A.

Helen Hutchinson

659. At the time of the Holiday Farm Fire, Helen Hutchinson occupied a residence located on real property owned by the Helen A. Hutchinson Living Trust and owned personal property located within the residence, all at 47015 Goodpasture Road, Vida, Oregon, and within the Holiday Farm Fire Area.

660. The Holiday Farm Fire destroyed the residence and Hutchinson's personal property. Hutchinson has been denied use of the described real and personal property since the time of the Fire.

661. Because of the Fire, Hutchinson incurred costs and expenses necessary to secure and maintain alternative housing.

662. Hutchinson's economic losses are currently estimated as set forth in Exhibit A.

663. Hutchinson inhaled smoke and ash from the fire, causing respiratory distress, exacerbation of asthma, increased symptoms and relapse of multiple sclerosis ("MS"), sore throat, eye and sinus problems. Her injuries from the Fire significantly increased her symptoms from MS, increased the frequency and intensity of her migraines, and required an increase in her medications necessary to treat her migraines and MS. Helen struggled with disabilities before the Fire, which have

significantly increased because of her Fire-related injuries. She escaped her home on the night of the Fire surrounded by flames, and with the exception of one photograph of her mother and a few pieces of jewelry, she lost all of her possessions in the Fire, including a lifetime of saved cash, priceless art, and family heirlooms.

664. She has experienced stress, fear, inconvenience, and extreme emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

665. Hutchinson's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A..

Jacob Ivey

666. At the time of the Holiday Farm Fire, Jacob Ivey owned real and personal property located at 51802 Echo Street, Blue River, Oregon, and within the Holiday Farm Fire Area.

667. The Holiday Farm Fire destroyed Ivey's real and personal property, including a home, various structures and outbuildings, other personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Ivey has been denied use of his real and personal property since the time of the Fire and has incurred costs to inspect, clean, repair, replant, and/or restore his real and personal property to its original condition.

668. The market value of his property has been significantly reduced.

669. Because of the Fire, Ivey incurred costs and expenses necessary to secure and maintain alternative housing.

670. Ivey's economic losses are currently estimated as set forth in Exhibit A.

671. Ivey inhaled smoke and ash from the Fire, causing headaches, eye irritation and sore throat.

672. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

673. Ivey's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Ellen Johnson

674. At the time of the Holiday Farm Fire, Ellen Johnson owned real and personal property located at 46008 North Gate Creek Road, Vida, Oregon, and within the Holiday Farm Fire Area.

675. The Holiday Farm Fire damaged or destroyed substantial portions of Ellen Johnson real and personal property, including 12' x 16' garden shed and all contents, 350 feet of fencing, other various structures and outbuildings, personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Ellen Johnsons has been denied use of the real and personal property since the time of the Fire and has incurred costs to inspect, clean, repair, replant, and/or restore the real and personal property to its original condition.

676. The market value of the property has been significantly reduced.

677. Because of the Fire, Johnson incurred costs and expenses necessary to secure and maintain alternative housing.

678. Johnson's economic losses are currently estimated as set forth in Exhibit A.

Steve Johnson

679. At the time of the Holiday Farm Fire, Steve Johnson owned real and personal property located at 46008 North Gate Creek Road, Vida, Oregon, and within the Holiday Farm Fire Area.

680. The Holiday Farm Fire damaged or destroyed substantial portions of Steve Johnson real and personal property, including 12' x 16' garden shed and all contents, 350 feet of fencing, other

various structures and outbuildings, personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Steve Johnson has been denied use of the real and personal property since the time of the Fire and has incurred costs to inspect, clean, repair, replant, and/or restore the real and personal property to its original condition.

681. The market value of the property has been significantly reduced.

682. Because of the Fire, Johnson incurred costs and expenses necessary to secure and maintain alternative housing.

683. Johnson's economic losses are currently estimated as set forth in Exhibit A.

Daniel Kane

684. At the time of the Holiday Farm Fire, Daniel Kane owned real and personal property located at 54391 Rainbow Drive, McKenzie Bridge, Oregon, and within the Holiday Farm Fire Area.

685. The Holiday Farm Fire destroyed Kane's real and personal property, including a home, personal possessions, a substantial collection of antiques, and timber, landscaping, decorative trees, and other beneficial foliage. Kane has been denied use of his real and personal property since the time of the Fire, and has incurred costs to inspect, clean, repair, replant, and/or restore his real and personal property to its original condition.

686. The market value of his property has been significantly reduced.

687. Kane's economic losses are currently estimated as set forth in Exhibit A.

688. Kane inhaled smoke and ash from the Fire causing respiratory distress and headaches.

689. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

690. Kane's non-economic losses are currently estimated not to exceed the figure set forth in

Exhibit A.

Sally Kane

691. At the time of the Holiday Farm Fire, Sally Kane owned real and personal property located at 54391 Rainbow Drive, McKenzie Bridge, Oregon, and within the Holiday Farm Fire Area.

692. The Holiday Farm Fire destroyed Kane's real and personal property, including a home, personal possessions, a substantial collection of antiques, and timber, landscaping, decorative trees, and other beneficial foliage. Kane has been denied use of his real and personal property since the time of the Fire, and has incurred costs to inspect, clean, repair, replant, and/or restore her real and personal property to its original condition.

693. The market value of her property has been significantly reduced.

694. Because of the Fire, Kane has incurred costs and expenses necessary to secure and maintain alternative housing.

695. Kane's economic losses are currently estimated as set forth in Exhibit A.

696. Kane inhaled smoke and ash from the Fire causing respiratory distress and headaches.

697. She has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

698. Kane's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Ky Karnecki

699. At the time of the Holiday Farm Fire, Karnecki owned a business and personal property located at 54655 McKenzie River Drive, D5, Blue River, Oregon 97413 and within the Holiday Farm Fire Area.

700. The Holiday Farm Fire destroyed Karnecki's personal property and caused a loss of business income.

701. Because of the Fire, Karnecki has incurred costs and expenses necessary to secure and maintain alternative housing and business space.

702. Karnecki's economic losses are currently estimated as set forth in Exhibit A.

Kayla Knight

703. At the time of the Holiday Farm Fire, Knight owned real and personal property located at 47834 McKenzie Highway, Vida, Oregon 97488 and within the Holiday Farm Fire Area.

704. The Holiday Farm Fire destroyed Knight's real and personal property, including a residence, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Knight has been denied use of the damaged or destroyed real and personal property since the time of the Fire, and has incurred costs to replace, inspect, clean, repair, replant, and/or restore the real and personal property to its original condition.

705. The market value of the property has been significantly reduced.

706. Because of the Fire, Knight has incurred costs and expenses necessary to secure and maintain alternative housing.

707. Knight's economic losses are currently estimated as set forth in Exhibit A.

708. Knight inhaled smoke and ash causing respiratory distress, sinus problems requiring medical treatment, sore eyes, and headaches.

709. She has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

710. Knight's non-economic losses are currently estimated to not exceed the figure set forth in

Exhibit A.

Shannon Knight

711. At the time of the Holiday Farm Fire, Knight owned real and personal property located at 47834 McKenzie Highway, Vida, Oregon 97488 and within the Holiday Farm Fire Area.

712. The Holiday Farm Fire destroyed Knight's real and personal property, including a residence, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Knight has been denied use of the damaged or destroyed real and personal property since the time of the Fire, and has incurred costs to replace, inspect, clean, repair, replant, and/or restore the real and personal property to its original condition.

713. The market value of the property has been significantly reduced.

714. Because of the Fire, Knight has incurred costs and expenses necessary to secure and maintain alternative housing.

715. Knight's economic losses are currently estimated as set forth in Exhibit A.

716. Knight inhaled smoke and ash from the Fire causing respiratory distress, sinus problems requiring medical treatment, sore eyes, and headaches.

717. Knight has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

718. Knight's non-economic losses are currently estimated to not exceed the figure set forth in Exhibit A.

Tracy Knight

719. At the time of the Holiday Farm Fire, Knight owned real and personal property located at 47834 McKenzie Highway, Vida, Oregon 97488 and within the Holiday Farm Fire Area.

720. The Holiday Farm Fire destroyed Knight's real and personal property, including a residence, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Knight has been denied use of the damaged or destroyed real and personal property since the time of the Fire, and has incurred costs to replace, inspect, clean, repair, replant, and/or restore the real and personal property to its original condition.

721. The market value of the property has been significantly reduced.

722. Because of the Fire, Knight has incurred costs and expenses necessary to secure and maintain alternative housing.

723. Knight's economic losses are currently estimated as set forth in Exhibit A.

724. Knight inhaled smoke and ash causing respiratory distress, sinus problems requiring medical treatment, sore eyes, and headaches.

725. Knight has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire. Knight's condition required treatment by a mental health counselor and anxiety medications.

726. Knight's non-economic losses are currently estimated to not exceed the figure set forth in Exhibit A.

Betty Koehler personally and dba Ike's Pizza

727. At the time of the Holiday Farm Fire, Betty Koehler personally, and Betty Koehler doing business as Ike's Pizza owned real and personal property located at 44851 McKenzie Highway, Leaburg, Oregon and within the Holiday Farm Fire Area.

728. The Holiday Farm Fire destroyed Koehler's real and personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Koehler has been denied

use of the described real and personal property since the time of the Fire, and she has incurred costs to inspect, clean, repair, replant, and/or restore her real and personal property to its original condition.

729. The market value of her property has been significantly reduced.

730. Koehler also suffered economic losses from business interference and interruption of business at Ike's Pizza restaurant.

731. Koehler's economic losses are currently estimated as set forth in Exhibit A.

732. Koehler inhaled smoke and ash and suffered respiratory distress, headaches and sore throat.

733. She has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

734. Koehler's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Michael Kruse

735. At the time of the Holiday Farm Fire, Kruse resided and maintained personal property at 51668 Blue River Drive, Blue River, Oregon 97413 and within the Holiday Farm Fire Area.

736. The Holiday Farm Fire destroyed Kruse's personal property, including a mobile home, recreational vehicle, Ford F150 truck, and other possessions. Kruse has been denied use of the damaged or destroyed personal property since the time of the Fire, and has incurred costs to replace, inspect, clean, repair, and/or restore his personal property to its original condition.

737. The market value of his property has been significantly reduced.

738. Because of the Fire, Kruse has incurred costs and expenses necessary to secure and maintain alternative housing.

739. Kruse's economic losses are currently estimated as set forth in Exhibit A.

740. Kruse inhaled smoke and ash causing respiratory distress, headaches, and upset stomach.

741. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

742. Kruse's non-economic losses are currently estimated to not exceed the figure set forth in Exhibit A.

Brad Kumm

743. At the time of the Holiday Farm Fire, Kumm owned real and personal property located at 90401 Mountain View Lane, Leaburg, Oregon 97489 and within the Holiday Farm Fire Area.

744. The Holiday Farm Fire destroyed Kumm's real and personal property, including his home, shop, pumphouse, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Kumm has been denied use of the damaged or destroyed real and personal property since the time of the Fire, and has incurred costs to replace, inspect, clean, repair, replant, and/or restore his/her real and personal property to its original condition.

745. The market value of his property has been significantly reduced.

746. Because of the Fire, Kumm has incurred costs and expenses necessary to secure and maintain alternative housing.

747. Kumm's economic losses are currently estimated as set forth in Exhibit A.

748. Kumm inhaled smoke and ash causing respiratory distress, sore throat, and headaches.

749. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

750. Kumm's non-economic losses are currently estimated to not exceed the figure set forth in

Exhibit A.

Lori Kumm

751. At the time of the Holiday Farm Fire, Kumm owned real and personal property located at 90401 Mountain View Lane, Leaburg, Oregon 97489 and within the Holiday Farm Fire Area.

752. The Holiday Farm Fire destroyed Kumm's real and personal property, including her home, shop, pumphouse, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Kumm has been denied use of the damaged or destroyed real and personal property since the time of the Fire, and has incurred costs to replace, inspect, clean, repair, replant, and/or restore his/her real and personal property to its original condition.

753. The market value of her property has been significantly reduced.

754. Because of the Fire, Kumm has incurred costs and expenses necessary to secure and maintain alternative housing.

755. Kumm's economic losses are currently estimated as set forth in Exhibit A.

756. Kumm inhaled smoke and ash causing respiratory distress, sore throat, and headaches.

757. She has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

758. Kumm's non-economic losses are currently estimated to not exceed the figure set forth in Exhibit A.

Scott Landgreen

759. At the time of the Holiday Farm Fire, Scott Landgreen owned real and personal property located at 50004 McKenzie Highway, Vida, Oregon, and within the Holiday Farm Fire Area.

760. The Holiday Farm Fire destroyed Landgreen's real and personal property, and a

significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Landgreen has been denied use of the described real and personal property since the time of the Fire, and has incurred costs to inspect, clean, repair, replant, and/or restore his real and personal property to its original condition.

761. The market value of his property has been significantly reduced.

762. Landgreen's economic losses are currently estimated as set forth in Exhibit A.

763. Landgreen inhaled smoke and ash from the Fire, causing respiratory distress, headaches and sore throat.

764. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

765. Landgreen's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Donnel Lang

766. At the time of the Holiday Farm Fire, Lang resided and maintained personal property at 51290 McKenzie Highway, Vida, Oregon 97488 and within the Holiday Farm Fire Area.

767. The Holiday Farm Fire destroyed Lang's personal property. Lang has been denied use of the damaged or destroyed personal property since the time of the Fire, and has incurred costs to inspect, replace, clean, repair, and/or restore his personal property to its original condition.

768. The market value of his property has been significantly reduced.

769. Because of the Fire, Lang has incurred costs and expenses necessary to secure and maintain alternative housing.

770. Lang's economic losses are currently estimated as set forth in Exhibit A.

771. Lang inhaled smoke and ash causing respiratory distress, sore throat, and headaches.

772. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

773. Lang's non-economic losses are currently estimated to not exceed the figure set forth in Exhibit A.

Christopher Lavoie

774. At the time of the Holiday Farm Fire, Lavoie resided and maintained personal property at 51668 Blue River Drive, Blue River, Oregon 97413 and within the Holiday Farm Fire Area.

775. The Holiday Farm Fire destroyed Lavoie's personal property, including all household contents and a motor vehicle. Lavoie has been denied use of the damaged or destroyed personal property since the time of the Fire, and has incurred costs to inspect, replace, clean, repair, and/or restore his personal property to its original condition.

776. The market value of the property has been significantly reduced.

777. Because of the Fire, Lavoie incurred costs and expenses necessary to secure and maintain alternative housing.

778. Lavoie's economic losses are currently estimated as set forth in Exhibit A.

779. Lavoie inhaled smoke and ash while fleeing the approaching Fire, causing respiratory distress and related conditions.

780. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

781. Lavoie's non-economic losses are currently estimated to not exceed the figure set forth in Exhibit A.

Joseph Lawson

782. At the time of the Holiday Farm Fire, Lawson resided and maintained personal property at 50966 McKenzie Highway, Vida, Oregon and within the Holiday Farm Fire Area.

783. The Holiday Farm Fire destroyed Lawson's personal property, including a 20-year art portfolio, 1988 Honda Prelude, clothes, books, and household items. Lawson has been denied use of the damaged or destroyed personal property since the time of the Fire, and has incurred costs to inspect, replace, clean, repair, and/or restore his personal property to its original condition.

784. The market value of the property has been significantly reduced.

785. Because of the Fire, Lawson incurred costs and expenses necessary to secure and maintain alternative housing.

786. Lawson's economic losses are currently estimated as set forth in Exhibit A.

Andrea Lowry

787. At the time of the Holiday Farm Fire, Andrea Lowry owned real and personal property located at 52896 McKenzie Highway, Blue River, Oregon and within the Holiday Farm Fire Area.

788. The Holiday Farm Fire destroyed Lowry's real and personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Andrea Lowry has been denied use of the described real and personal property since the time of the Fire, and has incurred costs to inspect, clean, repair, replant, and/or restore the real and personal property to its original condition.

789. The market value of the property has been significantly reduced.

790. Because of the Fire, Lowry incurred costs and expenses necessary to secure and maintain alternative housing.

791. Lowry's economic losses are currently estimated as set forth in Exhibit A.

792. Lowry inhaled smoke and ash from the Fire, causing respiratory distress, headaches and sore throat.

793. She has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

794. Lowry's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

John Lowry

795. At the time of the Holiday Farm Fire, John Lowry owned real and personal property located at 52896 McKenzie Highway, Blue River, Oregon and within the Holiday Farm Fire Area.

796. The Holiday Farm Fire destroyed Lowry's real and personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Lowry has been denied use of the described real and personal property since the time of the Fire, and has incurred costs to inspect, clean, repair, replant, and/or restore the real and personal property to its original condition.

797. The market value of the property has been significantly reduced.

798. Because of the Fire, Lowry incurred costs and expenses necessary to secure and maintain alternative housing.

799. Lowry's economic losses are currently estimated as set forth in Exhibit A.

800. Lowry inhaled smoke and ash from the Fire, causing respiratory distress, headaches and sore throat.

801. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

802. Lowry's non-economic losses are currently estimated not to exceed the figure set forth in

Exhibit A.

Todd Lowry

803. At the time of the Holiday Farm Fire, Todd Lowry owned real and personal property located at 50997 McKenzie Highway, Vida, Oregon and within the Holiday Farm Fire Area.

804. The Holiday Farm Fire destroyed Lowry's real and personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Todd Lowry has been denied use of the described real and personal property since the time of the Fire, and has incurred costs to inspect, clean, repair, replant, and/or restore his real and personal property to its original condition.

805. The market value of his property has been significantly reduced.

806. Because of the Fire, Lowry incurred costs and expenses necessary to secure and maintain alternative housing.

807. Lowry's economic losses are currently estimated as set forth in Exhibit A.

808. Lowry inhaled smoke and ash from the Fire causing headaches and eye irritation.

809. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

810. Lowry's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Tanya Luttrell

811. At the time of the Holiday Farm Fire, Luttrell resided and maintained personal property at 53205 McKenzie Highway, Blue River, Oregon 97413 and within the Holiday Farm Fire Area.

812. The Holiday Farm Fire destroyed Luttrell's personal property. Luttrell has been denied use of the damaged or destroyed personal property since the time of the Fire, and has incurred costs to

inspect, replace, clean, repair, and/or restore her personal property to its original condition.

813. Because of the Fire, Luttrell has incurred costs and expenses necessary to secure and maintain alternative housing.

814. Luttrell's economic losses are currently estimated as set forth in Exhibit A.

815. Luttrell inhaled smoke and ash causing respiratory distress, sore throat, and headaches.

816. She has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

817. Luttrell's non-economic losses are currently estimated to not exceed the figure set forth in Exhibit A.

Thomas Maddock

818. At the time of the Holiday Farm Fire, Maddock resided and maintained personal property at 45542 Good Pasture Road, Vida, Oregon 97488 and within the Holiday Farm Fire Area.

819. The Holiday Farm Fire destroyed Maddock's personal property, including machine shop tools, a Bridgeport Series 2 CNC milling machine, Ganesh GT35 CNC lathe, Hass Via1 CNC mill, Clearman 25" square column drill press, deburring and finishing machinery, and other tools and personal property. Maddock has been denied use of the damaged or destroyed personal property since the time of the Fire, and has incurred costs to inspect, replace, clean, repair, and/or restore his personal property to its original condition.

820. Because of the Fire, Maddock has incurred costs and expenses necessary to secure and maintain alternative housing.

821. Maddock's economic losses are currently estimated as set forth in Exhibit A.

822. Maddock inhaled smoke and ash causing respiratory distress, headaches, and upset

stomach.

823. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

824. Maddock's non-economic losses are currently estimated to not exceed the figure set forth in Exhibit A.

Adam Marchacos

825. At the time of the Holiday Farm Fire, Adam Marchacos owned real and personal property located at 45560 South Gate Creek Road, Vida, Oregon and within the Holiday Farm Fire Area.

826. The Holiday Farm Fire destroyed Marchacos's real and personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Marchacos has been denied use of and profits from the described real and personal property since the time of the Fire, and has incurred costs to inspect, clean, repair, replant, and/or restore the real and personal property to its original condition.

827. The market value of the property has been significantly reduced.

828. Marchacos's economic losses are currently estimated as set forth in Exhibit A.

Denise Marchacos

829. At the time of the Holiday Farm Fire, Denise Marchacos owned real and personal property located at 45560 South Gate Creek Road, Vida, Oregon and within the Holiday Farm Fire Area.

830. The Holiday Farm Fire destroyed Marchacos's real and personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Marchacos has been denied use of and profits from the described real and personal property since the time of the Fire,

and has incurred costs to inspect, clean, repair, replant, and/or restore the real and personal property to its original condition.

831. The market value of the property has been significantly reduced.

832. Marchacos's economic losses are currently estimated as set forth in Exhibit A.

Beverly Mayorga

833. At the time of the Holiday Farm Fire, Mayorga owned real and personal property located at 56629 McKenzie Highway, McKenzie Bridge, Oregon 97413 and within the Holiday Farm Fire Area.

834. The Holiday Farm Fire destroyed Mayorga's real and personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Mayorga has been denied use of the damaged or destroyed real and personal property since the time of the Fire, and has incurred costs to replace, inspect, clean, repair, replant, and/or restore her real and personal property to its original condition.

835. The market value of her property has been significantly reduced.

836. Because of the Fire, Mayorga has incurred costs and expenses necessary to secure and maintain alternative housing.

837. Mayorga's economic losses are currently estimated as set forth in Exhibit A.

838. Mayorga inhaled smoke and ash causing respiratory distress, sore throat, and headaches.

839. She has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

840. Mayorga's non-economic losses are currently estimated to not exceed the figure set forth in Exhibit A.

Mark McInnis

841. At the time of the Holiday Farm Fire, Mark McInnis resided at real property owned by the T & K Anderson Trust located at 51290 McKenzie Highway, Vida, Oregon and within the Holiday Farm Fire Area. McInnis had a substantial amount of personal property at the residence.

842. The Holiday Farm Fire destroyed McInnis's personal property and denied him the use and his right to occupy the described real personal property since the time of the Fire.

843. McInnis's economic losses are currently estimated as set forth in Exhibit A.

844. McInnis inhaled smoke and ash from the Fire causing respiratory distress, headaches, and sore throat.

845. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

846. McInnis's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Andy McWilliams

847. At the time of the Holiday Farm Fire, Andy McWilliams occupied a residence located on real property owned by the McWilliams Living Trust and owned personal property located within the residence, all at 47227 Goodpasture Road, Vida, Oregon, and within the Holiday Farm Fire Area.

848. The Holiday Farm Fire destroyed McWilliams's personal property. McWilliams has been denied use of the described real and personal property since the time of the Fire.

849. Because of the Fire, McWilliams incurred costs and expenses necessary to secure and maintain alternative housing.

850. Williams' economic losses are currently estimated as set forth in Exhibit A.

851. During the evacuation, McWilliams suffered sinus problems, headaches caused by inhaling smoke and ash from the Fire, and sore eyes.

852. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

853. McWilliams' non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Elizabeth McWilliams

854. At the time of the Holiday Farm Fire, Elizabeth McWilliams occupied a residence located on real property owned by the McWilliams Living Trust and owned personal property located within the residence, all at 47227 Goodpasture Road, Vida, Oregon, and within the Holiday Farm Fire Area.

855. The Holiday Farm Fire destroyed McWilliams's personal property. McWilliams has been denied use of the described real and personal property since the time of the Fire.

856. Because of the Fire, McWilliams incurred costs and expenses necessary to secure and maintain alternative housing.

857. McWilliams's economic losses are currently estimated as set forth in Exhibit A.

858. During the evacuation, McWilliams suffered sinus problems, headaches caused by inhaling smoke and ash from the Fire, and sore eyes.

859. She has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

860. McWilliams's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Raymond Merrill

861. At the time of the Holiday Farm Fire, Raymond Merrill owned real and personal property located at 49363 Eagle Rock Place, Vida, Oregon and within the Holiday Farm Fire Area.

862. The Holiday Farm Fire destroyed Merrill's real and personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Merrill has been denied use of the described real and personal property since the time of the Fire, and has incurred costs to inspect, clean, repair, replant, and/or restore his real and personal property to its original condition.

863. The market value of his property has been significantly reduced.

864. Because of the Fire, Merrill incurred costs and expenses necessary to secure and maintain alternative housing.

865. Merrill's economic losses are currently estimated as set forth in Exhibit A.

866. Merrill has also suffered lower back strain, wrist, and finger joint strain during his evacuation from the Fire, and inhaled smoke and ash from the Fire causing respiratory distress.

867. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire. He continues to suffer from long term depression, confusion, anxiety, and the loss of his fiancé because of the stress of the fire.

868. Merrill's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Ellen Miner personally and dba 1st Oregon Cavalry & American Indian Museum

869. At the time of the Holiday Farm Fire, Ellen Miner personally and dba 1st Oregon Cavalry & American Indian Museum co-owned real and personal property located at 91160 Yager Road, Blue River, Oregon, and within the Holiday Farm Fire Area.

870. Miner co-owned and co-operated the 1st Oregon Cavalry & American Indian Museum on the property. The Museum consisted of several buildings and structures and a valuable collection of rare and high-quality historical artifacts.

871. The Holiday Farm Fire destroyed Miner's real and personal property, including all structures, her home, the museum, and all items within it, timber, landscaping, decorative trees, and other beneficial foliage.

872. Miner has been denied use of the real and personal property since the time of the Fire and has incurred costs to inspect, clean, repair, replant, and/or restore her real and personal property to its original condition.

873. The market value of the property has been significantly reduced.

874. Miner has also lost income from visitor donations to the museum.

875. Because of the Fire, Miner incurred costs and expenses necessary to secure and maintain alternative housing.

876. Ellen Miner's economic losses are currently estimated as set forth in Exhibit A.

877. Ellen Miner has inhaled smoke and ash from the fire, causing headaches and eye irritation.

878. She has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

879. Ellen Miner's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Ronald Miner personally and dba 1st Oregon Cavalry & American Indian Museum

880. At the time of the Holiday Farm Fire, Ronald Miner personally and dba 1st Oregon

Cavalry & American Indian Museum co-owned real and personal property located at 91160 Yager Road, Blue River, Oregon, and within the Holiday Farm Fire Area.

881. Miner co-owned and co-operated the 1st Oregon Cavalry & American Indian Museum on the property. The Museum consisted of several buildings and structures and a valuable collection of rare and high-quality historical artifacts.

882. The Holiday Farm Fire destroyed Miner's real and personal property, including all structures, his home, the museum, and all items within it, timber, landscaping, decorative trees, and other beneficial foliage.

883. Miner has been denied use of the real and personal property since the time of the Fire and has incurred costs to inspect, clean, repair, replant, and/or restore his real and personal property to its original condition.

884. The market value of the property has been significantly reduced.

885. Miner has also lost income from visitor donations to the museum.

886. Because of the Fire, Miner incurred costs and expenses necessary to secure and maintain alternative housing.

887. Miner's economic losses are currently estimated as set forth in Exhibit A.

888. Miner has inhaled smoke and ash from the fire, causing headaches and eye irritation.

889. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

890. Ronald Miner's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Andre Moore

891. At the time of the Holiday Farm Fire, Moore owned real and personal property located at 48570 McKenzie Highway, Vida, Oregon 97488 and within the Holiday Farm Fire Area.

892. The Holiday Farm Fire destroyed Moore's real and personal property, including a home with deck, garage, tiny home, greenhouse, chicken coop, chickens, shop, tools, a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Moore has been denied use of the damaged or destroyed real and personal property since the time of the Fire, and has incurred costs to replace, inspect, clean, repair, replant, and/or restore her real and personal property to its original condition.

893. The market value of his property has been significantly reduced.

894. Because of the Fire, Moore has incurred costs and expenses necessary to secure and maintain alternative housing.

895. Moore's economic losses are currently estimated as set forth in Exhibit A.

896. Moore inhaled smoke and ash from the Fire causing respiratory distress, sore throat, headaches and upset stomach. He also injured his back during the cleanup and aftermath of the Fire.

897. He has experienced stress, fear, inconvenience, emotional and mental distress, and post-traumatic stress disorder because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

898. Moore's non-economic losses are currently estimated to not exceed the figure set forth in Exhibit A.

Anthony Moore

899. At the time of the Holiday Farm Fire, Anthony Moore owned real and personal property located at 48570 McKenzie Highway, Vida, Oregon and within the Holiday Farm Fire Area.

900. The Holiday Farm Fire destroyed Moore's real and personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Moore has been denied use of the described real and personal property since the time of the Fire, and has incurred costs to inspect, clean, repair, replant, and/or restore his real and personal property to its original condition.

901. The market value of his property has been significantly reduced.

902. Because of the Fire, Moore incurred costs and expenses necessary to secure and maintain alternative housing.

903. Moore's economic losses are currently estimated as set forth in Exhibit A.

904. Moore inhaled smoke and ash from the Fire, causing headaches and sore throat.

905. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

906. Moore's non-economic losses are currently estimated to not exceed the figure set forth in Exhibit A.

Laurie Moore

907. At the time of the Holiday Farm Fire, Moore owned real and personal property located at 48570 McKenzie Highway, Vida, Oregon 97488 and within the Holiday Farm Fire Area.

908. The Holiday Farm Fire destroyed Moore's real and personal property, including a home with deck, garage, tiny home, greenhouse, chicken coop, chickens, shop, tools, a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Moore has been denied use of the damaged or destroyed real and personal property since the time of the Fire, and has incurred costs to replace, inspect, clean, repair, replant, and/or restore her real and personal property to its original condition.

909. The market value of her property has been significantly reduced.

910. Because of the Fire, Moore has incurred costs and expenses necessary to secure and maintain alternative housing.

911. Moore's economic losses are currently estimated as set forth in Exhibit A.

912. Moore inhaled smoke and ash from the Fire causing respiratory distress, sore throat, headaches, and upset stomach.

913. She has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

914. Moore's non-economic losses are currently estimated to not exceed the figure set forth in Exhibit A.

Charles Morden

915. At the time of the Holiday Farm Fire, Charles Morden owned real and personal property located at 45441 McKenzie Highway, Leaburg, Oregon, and within the Holiday Farm Fire Area.

916. Morden owned and operated the Riverside Inn Restaurant on the property. The Riverside Inn consisted of buildings and structures used for a restaurant and commercial lodging.

917. The Holiday Farm Fire damaged Morden's real and personal property, including portions of the structures, timber, landscaping, decorative trees, and other beneficial foliage.

918. Morden has been denied use of his real and personal property since the time of the Fire and has incurred costs to inspect, clean, repair, replant, and/or restore his real and personal property to its original condition.

919. The market value of his property has been significantly reduced.

920. Morden has also lost income from the inability to operate the restaurant and lodging

business, or to successfully market or sell the Riverside Inn property at its original value.

921. Morden's economic losses are currently estimated as set forth in Exhibit A.

922. Morden inhaled smoke and ash from the Fire, causing headaches and sore throat.

923. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

924. Morden's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Colton Morris

925. At the time of the Holiday Farm Fire, Morris owned real and personal property located at 51745 McKenzie Street, Blue River, Oregon 97413 and within the Holiday Farm Fire Area.

926. The Holiday Farm Fire destroyed Morris's real and personal property, home, chicken coop, woodshed, fence, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Morris has been denied use of the damaged or destroyed real and personal property since the time of the Fire, and has incurred costs to replace, inspect, clean, repair, replant, and/or restore his real and personal property to its original condition.

927. The market value of his property has been significantly reduced.

928. Because of the Fire, Morris has incurred costs and expenses necessary to secure and maintain alternative housing.

929. Morris's economic losses are currently estimated as set forth in Exhibit A.

930. Morris inhaled smoke and ash causing respiratory distress, sore throat, and headaches, and injured his right calf muscle while escaping the Fire.

931. He has experienced stress, fear, inconvenience, and emotional and mental distress

because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

932. Morris's non-economic losses are currently estimated to not exceed the figure set forth in Exhibit A.

Gale Morris

933. At the time of the Holiday Farm Fire, Morris owned real and personal property designated as Lane County Tax Map lot 1645304001300, 51668 Blue River Drive, Blue River, Oregon, 97413 and within the Holiday Farm Fire Area.

934. The Holiday Farm Fire destroyed Morris' real and personal property, including a house, yurt, utility building, utility trailer, production building, toolshed, personal items, gas stove, couch, furniture, hot tub, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Morris has been denied use of the damaged or destroyed real and personal property since the time of the Fire, and has incurred costs to replace, inspect, clean, repair, replant, and/or restore the real and personal property to its original condition.

935. The market value of the property has been significantly reduced.

936. Because of the Fire, Morris has incurred costs and expenses necessary to secure and maintain alternative housing.

937. Morris' economic losses are currently estimated as set forth in Exhibit A.

Molly Morris

938. At the time of the Holiday Farm Fire, Morris owned real and personal property designated as Lane County Tax Maplot 1645304001300 and within the Holiday Farm Fire Area.

939. The Holiday Farm Fire destroyed Morris' real and personal property, including a house, yurt, utility building, utility trailer, production building, toolshed, personal items, gas stove, couch,

furniture, hot tub, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Morris has been denied use of the damaged or destroyed real and personal property since the time of the Fire, and has incurred costs to replace, inspect, clean, repair, replant, and/or restore the real and personal property to its original condition.

940. The market value of the property has been significantly reduced.

941. Because of the Fire, Morris has incurred costs and expenses necessary to secure and maintain alternative housing.

942. Morris' economic losses are currently estimated as set forth in Exhibit A.

Dennis Charles Mortimer

943. At the time of the Holiday Farm Fire, Dennis Charles Mortimer owned real and personal property located at 53198 McKenzie Highway, Blue River, Oregon, and within the Holiday Farm Fire Area.

944. The Holiday Farm Fire destroyed Mortimer's residence, other structures, and outbuildings, personal property, including but not limited to tools and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Mortimer has been denied use of his real and personal property since the time of the Fire and has incurred costs to inspect, clean, repair, replant, and/or restore his real and personal property to its original condition.

945. The market value of his property has been significantly reduced.

946. Mortimer's economic losses are currently estimated as set forth in Exhibit A.

947. Mortimer suffered burns to his feet and injuries to his ankle and knee while escaping the Fire. He also inhaled smoke and ash causing headaches and sore throat.

948. He has experienced stress, fear, inconvenience, and emotional and mental distress

because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

949. Mortimer's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Leslie Moss

950. At the time of the Holiday Farm Fire, Leslie Moss owned real and personal property located at 45745 North Gate Creek Road, Vida, Oregon and within the Holiday Farm Fire Area.

951. The Holiday Farm Fire destroyed Moss's real and personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Moss has been denied use of the described real and personal property since the time of the Fire, and has incurred costs to inspect, clean, repair, replant, and/or restore the real and personal property to its original condition.

952. The market value of the property has been significantly reduced.

953. Moss's economic losses are currently estimated as set forth in Exhibit A.

954. Moss inhaled smoke and ash, causing headaches, sore throat, and sinus problems.

955. She has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

956. Moss's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Peter Moss

957. At the time of the Holiday Farm Fire, Peter Moss owned real and personal property located at 45745 North Gate Creek Road, Vida, Oregon and within the Holiday Farm Fire Area.

958. The Holiday Farm Fire destroyed Moss's real and personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Moss has been denied use

of the described real and personal property since the time of the Fire, and has incurred costs to inspect, clean, repair, replant, and/or restore the real and personal property to its original condition.

959. The market value of the property has been significantly reduced.

960. Because of the Fire, Moss incurred costs and expenses necessary to secure and maintain alternative housing.

961. Moss's economic losses are currently estimated as set forth in Exhibit A.

962. Moss inhaled smoke and ash from the Fire, causing headaches, sore throat, and sinus problems.

963. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire. Moss also suffers from PTSD and exacerbated allergies caused by bodily injuries and related stress from the Fire.

964. Moss's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Cyndie Moyer

965. At the time of the Holiday Farm Fire, Cyndie Moyer owned real and personal property located at 90421 Mountain View Lane, Leaburg, Oregon and within the Holiday Farm Fire Area.

966. The Holiday Farm Fire destroyed Moyer's real and personal property, including a lifetime of work, art, and precious belongings and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Moyer has been denied use of the described real and personal property since the time of the Fire, and has incurred costs to inspect, clean, repair, replant, and/or restore the real and personal property to its original condition.

967. The market value of the property has been significantly reduced.

968. Because of the Fire, Moyer incurred costs and expenses necessary to secure and maintain alternative housing.

969. Moyer's economic losses are currently estimated as set forth in Exhibit A.

970. Moyer inhaled smoke and ash from the Fire, causing respiratory distress, headaches, and sore throat. She also suffered cuts, scrapes, bruises, and strains while evacuating from the Fire.

971. She has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

972. Moyer's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

David Murphy

973. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

974. At the time of the Holiday Farm Fire, David Murphy owned real and personal property located at 52962, 52966, 52970, and 52972 McKenzie Highway, Blue River, Oregon 97413 and within the Holiday Farm Fire Area.

975. The Holiday Farm Fire destroyed Murphy's real and personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Murphy has been denied use of the described real and personal property since the time of the Fire, and has incurred costs to inspect, clean, repair, replant, and/or restore the real and personal property to its original condition.

976. The market value of the property has been significantly reduced.

977. Murphy also lost income from potential rentals of a residence on the property.

978. Murphy's economic losses are currently estimated as set forth in Exhibit A.

979. Murphy suffered low back pain resulting from the cleanup of debris on his property, as well as a dry scratchy sore throat, headaches, eye irritation, and fatigue from inhaling smoke and ash from the Fire.

980. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

981. Murphy's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Janicé Myers

982. At the time of the Holiday Farm Fire, Janicé Myers resided at real property owned by Arthur Myers located at 49687 McKenzie Highway, Vida, Oregon and within the Holiday Farm Fire Area. Myers had a substantial amount of personal property at the residence.

983. The Holiday Farm Fire damaged Myers's personal property and denied her the use and enjoyment and her right to occupy the described real personal property since the time of the Fire.

984. Because of the Fire, Myers incurred costs and expenses necessary to secure and maintain alternative housing.

985. Myers's economic losses are currently estimated as set forth in Exhibit A.

986. Myers inhaled smoke and ash from the Fire, causing headaches, sore throat, and respiratory distress.

987. She has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

988. Myers's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

989. Cynthia Myhrvold

990. At the time of the Holiday Farm Fire, Cynthia Myhrvold owned real and personal property located at 50464 McKenzie Highway, Vida, Oregon, and within the Holiday Farm Fire Area.

991. The Holiday Farm Fire destroyed Myhrvold's residence, numerous other structures and outbuildings, personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Myhrvold has been denied use of the real and personal property since the time of the Fire and has incurred costs to inspect, clean, repair, replant, and/or restore the real and personal property to its original condition.

992. The market value of them property has been significantly reduced.

993. Because of the Fire, Myhrvold has incurred costs and expenses necessary to secure and maintain alternative housing.

994. Myhrvold's economic losses are currently estimated as set forth in Exhibit A.

995. Myhrvold inhaled smoke and ash from the Fire, causing respiratory distress, headaches, eye irritation, and sore throat.

996. She has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

997. Myhrvold's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Jerry Myhrvold

998. At the time of the Holiday Farm Fire, Jerry Myhrvold owned real and personal property located at 50464 McKenzie Highway, Vida, Oregon, and within the Holiday Farm Fire Area.

999. The Holiday Farm Fire destroyed Myhrvold's residence, numerous other structures and

outbuildings, personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Myhrvold has been denied use of the real and personal property since the time of the Fire and has incurred costs to inspect, clean, repair, replant, and/or restore the real and personal property to its original condition.

1000. The market value of the property has been significantly reduced.

1001. Because of the Fire, Myhrvold incurred costs and expenses necessary to secure and maintain alternative housing.

1002. Myhrvold's economic losses are currently estimated as set forth in Exhibit A.

1003. Myhrvold inhaled smoke and ash from the fire causing respiratory distress, headaches, eye irritation, and sore throat.

1004. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

1005. Myhrvold's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Kathleen Nesslin

1006. At the time of the Holiday Farm Fire, Kathleen Nesslin owned real and personal property located at 90953 Angels Flight Road, Walterville, Oregon, and within the Holiday Farm Fire Area.

1007. The Holiday Farm Fire destroyed Nesslin's residence, detached garage, barn, personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Nesslin has been denied use of her real and personal property since the time of the Fire and has incurred costs to inspect, clean, repair, replant, and/or restore her real and personal property to its original condition.

1008. The market value of her property has been significantly reduced.

1009. Because of the Fire, Nesslin incurred costs and expenses necessary to secure and maintain alternative housing.

1010. Nesslin's economic losses are currently estimated as set forth in Exhibit A.

1011. Nesslin inhaled smoke and ash from the Fire, causing respiratory distress, headaches, sore throat, and eye irritation.

1012. She has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

1013. Nesslin's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Shaun Nugent

1014. At the time of the Holiday Farm Fire, Shaun Nugent owned real and personal property located at 48520 and 48083 McKenzie Highway, Vida, Oregon, and within the Holiday Farm Fire Area.

1015. The Holiday Farm Fire destroyed Nugent's real and personal property, including a rental residence, outbuildings, fences, decks, and most of the timber, landscaping, decorative trees, and other beneficial foliage. Nugent has been denied use of his real and personal property since the time of the Fire and has incurred costs to inspect, clean, repair, replant, and/or restore his real and personal property to its original condition.

1016. The market value of his property has been significantly reduced.

1017. Because of the Fire, Nugent incurred costs and expenses necessary to secure and maintain alternative housing.

1018. Nugent's economic losses are currently estimated as set forth in Exhibit A.

1019. Nugent inhaled smoke and ash from the fire, and suffered sore throat, headaches and eye irritation. He also suffered cuts, bruises, sprains, aches, and back pain from clearing the debris from his property.

1020. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

1021. Nugent's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Marion O'Leary

1022. At the time of the Holiday Farm Fire, Marion O'Leary owned real and personal property located at 46064 Gate Creek Road, Vida, Oregon, and within the Holiday Farm Fire Area.

1023. The Holiday Farm Fire destroyed O'Leary's property, including a home, other structures, personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. O'Leary has been denied use of the described real and personal property since the time of the Fire and has incurred costs to inspect, clean, repair, replant, and/or restore its real and personal property to its original condition.

1024. The market value of her property has been significantly reduced.

1025. Because of the Fire, O'Leary incurred costs and expenses necessary to secure and maintain alternative housing.

1026. O'Leary's economic losses are currently estimated as set forth in Exhibit A.

1027. O'Leary inhaled smoke and ash from the Fire, causing respiratory distress, sore throat, and coughing.

1028. O'Leary is in her 90s, and has experienced severe stress, fear, inconvenience, and

emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

1029. O'Leary's non-economic losses are currently estimated to not exceed the figure set forth in Exhibit A.

Daryl Lynn Polamero

1030. At the time of the Holiday Farm Fire, Daryl Lynn Polamero occupied a residence located on real property owned by the Polamero Family Trust and owned personal property located within the residence, all at 90236 Cascade View Drive, Vida, Oregon and within the Holiday Farm Fire Area.

1031. The Holiday Farm Fire destroyed the residence and Polamero's personal property. Polamero has been denied use of the described real and personal property since the time of the Fire.

1032. Because of the Fire, Polamero incurred costs and expenses necessary to secure and maintain alternative housing.

1033. Polamero's economic losses are currently estimated as set forth in Exhibit A.

1034. Polamero inhaled smoke and ash from the Fire, causing headaches, eye irritation, and sore throat.

1035. Polamero has experienced stress, fear, inconvenience, and emotional and mental distress, insomnia, anxiety, weight gain, and emotional meltdowns because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

1036. Polamero's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Perry Polamero

1037. At the time of the Holiday Farm Fire, Perry Polamero occupied a residence located on

real property owned by the Polamero Family Trust and owned personal property located within the residence, all at 90236 Cascade View Drive, Vida, Oregon and within the Holiday Farm Fire Area.

1038. The Holiday Farm Fire destroyed the residence and the Polamero's personal property. Polamero has been denied use of the described real and personal property since the time of the Fire.

1039. Because of the Fire, Polamero incurred costs and expenses necessary to secure and maintain alternative housing.

1040. Polamero's economic losses are currently estimated as set forth in Exhibit A.

1041. Polamero has inhaled smoke and ash from the Fire, causing exacerbation of pre-existing asthma, difficult breathing, and throat soreness and pain.

1042. Polamero was required to seek medical treatment for his injuries, and has experienced stress, fear, inconvenience, insomnia, anxiety, weight gain, emotional breakdown, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

1043. Polamero's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Linda Prout

1044. At the time of the Holiday Farm Fire, Linda Prout owned real and personal property located at 90405 Mountain View Lane, Walterville, Oregon, and within the Holiday Farm Fire Area.

1045. The Holiday Farm Fire destroyed Prout's residence, numerous other structures and outbuildings, personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Prout has been denied use of her real and personal property since the time of the Fire and has incurred costs to inspect, clean, repair, replant, and/or restore her real and personal property to its original condition.

1046. The market value of her property has been significantly reduced.

1047. Because of the Fire, Prout incurred costs and expenses necessary to secure and maintain alternative housing.

1048. Prout's economic losses are currently estimated as set forth in Exhibit A.

Anita Ragan

1049. At the time of the Holiday Farm Fire, Anita Ragan resided at real property owned by Robert Adams located at 47611 McKenzie Highway, Vida, Oregon and within the Holiday Farm Fire Area. Ragan had a substantial amount of personal property at the residence.

1050. The Holiday Farm Fire damaged or destroyed Ragan's personal property and denied her the use and her right to occupy the described real personal property since the time of the Fire.

1051. Because of the Fire, Ragan incurred costs and expenses necessary to secure and maintain alternative housing.

1052. Ragan's economic losses are currently estimated as set forth in Exhibit A.

1053. Ragan inhaled smoke and ash from the Fire, causing respiratory distress, burning eyes, and sore throat.

1054. She has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

1055. Ragan's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Cameron Simpson-Randall

1056. At the time of the Holiday Farm Fire, Simpson-Randall resided and maintained personal property at 45135 McKenzie Highway, Leaburg, Oregon 97489 and within the Holiday Farm Fire Area.

1057. The Holiday Farm Fire destroyed Simpson-Randall's personal property. Simpson-Randall has been denied use of the damaged or destroyed personal property since the time of the Fire, and has incurred costs to inspect, replace, clean, repair, and/or restore his personal property to its original condition.

1058. Because of the Fire, Simpson-Randall has incurred costs and expenses necessary to secure and maintain alternative housing.

1059. Simpson-Randall's economic losses are currently estimated as set forth in Exhibit A.

1060. Simpson-Randall inhaled smoke and ash causing respiratory distress, sore throat, and headaches.

1061. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

1062. Simpson-Randall's non-economic losses are currently estimated to not exceed the figure set forth in Exhibit A.

Katelyn Randall

1063. At the time of the Holiday Farm Fire, Katelyn Randall resided at real property owned by Shannon Randall located at 45135 McKenzie Highway, Leaburg, Oregon and within the Holiday Farm Fire Area. Katelyn Randall had a substantial amount of personal property at the residence.

1064. The Holiday Farm Fire damaged Randall's personal property and denied her the use and her right to occupy the described real personal property since the time of the Fire.

1065. Because of the Fire, Randall incurred costs and expenses necessary to secure and maintain alternative housing.

1066. Randall's economic losses are currently estimated as set forth in Exhibit A.

1067. Randall inhaled smoke and ash from the fire, causing respiratory distress, headaches, and sore throat.

1068. She has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire. She has become so afraid of fires that she now unplugs electronic devices when not in use, worries about fires every day, and can't stop intrusive and distracting thoughts about Fire. She currently is seeking mental health counseling once a week because of her anxiety caused by her bodily injuries, damages, and losses from the Fire.

1069. Randall's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Estate of Shannon Randall - David Simpson, Personal Representative

1070. Shannon Randall is deceased, and on October 9, 2023 David Simpson was duly appointed by the Lane County Circuit Court as the Personal Representative of her Estate. See, Lane County Case No. 23PB08860.

1071. At the time of the Holiday Farm Fire, Shannon Randall owned and resided at real property located at 45135 McKenzie Highway, Leaburg, Oregon and within the Holiday Farm Fire Area. Randall had a substantial amount of personal property at the residence.

1072. The Holiday Farm Fire destroyed the real and personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Randall and her estate has been denied use of the described real and personal property since the time of the Fire, and has incurred costs to inspect, clean, repair, replant, and/or restore the real and personal property to its original condition.

1073. The market value of the property has been significantly reduced.

1074. Because of the Fire, Randall has incurred costs and expenses necessary to secure and maintain alternative housing.

1075. Randall's and/or her estate's economic losses are currently estimated as set forth in Exhibit A.

1076. Randall inhaled smoke and ash from the fire, causing respiratory distress and headaches, and suffered cuts, bruises, and scrapes during the Fire and evacuation.

1077. She experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

1078. Randall and/or her estate's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Jordan Rawles

1079. At the time of the Holiday Farm Fire, Jordan Rawles resided at real property owned by Kenneth Lee Rawles, Jr. located at 46589 McKenzie Highway, Vida, Oregon and within the Holiday Farm Fire Area. Rawles had a substantial amount of personal property at the residence.

1080. The Holiday Farm Fire damaged Rawles' personal property and denied him the use and his right to occupy the described real personal property since the time of the Fire.

1081. Because of the Fire, Rawles incurred costs and expenses necessary to secure and maintain alternative housing.

1082. Rawles' economic losses are currently estimated as set forth in Exhibit A.

1083. Rawles inhaled smoke and ash from the Fire and was hospitalized afterward with pneumonia caused by the smoke and ash.

1084. He has experienced stress, fear, inconvenience, and emotional and mental distress

because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

1085. Rawles' non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Kenneth Lee Rawles, Jr.

1086. At the time of the Holiday Farm Fire, Rawles owned real and personal property located at 46589 McKenzie Highway, Vida, Oregon 97488 and within the Holiday Farm Fire Area.

1087. The Holiday Farm Fire destroyed Rawles' real and personal property, including his home, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Rawles has been denied use of the damaged or destroyed real and personal property since the time of the Fire, and has incurred costs to replace, inspect, clean, repair, replant, and/or restore his real and personal property to its original condition.

1088. The market value of his property has been significantly reduced.

1089. Because of the Fire, Rawles has incurred costs and expenses necessary to secure and maintain alternative housing.

1090. Rawles' economic losses are currently estimated as set forth in Exhibit A.

1091. Rawles inhaled smoke and ash causing respiratory distress, sore throat, and sore eyes.

1092. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

1093. Rawles' non-economic losses are currently estimated to not exceed the figure set forth in Exhibit A.

Brian Richards

1094. At the time of the Holiday Farm Fire, Brian Richards owned real and personal property

located at 46595 McKenzie Highway, Vida, Oregon and within the Holiday Farm Fire Area.

1095. The Holiday Farm Fire destroyed Richards' real and personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Richards has been denied use of the described real and personal property since the time of the Fire, and has incurred costs to inspect, clean, repair, replant, and/or restore his real and personal property to its original condition.

1096. The market value of his property has been significantly reduced.

1097. Richards' economic losses are currently estimated as set forth in Exhibit A.

1098. On the night the Fire started, Richards attempted to extinguish it on his property and inhaled heavy smoke and ash. He suffered back pain from running up and down his hillside trying to fight the Fire on his property and had chest congestion for weeks because of the smoke and ash he inhaled.

1099. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

1100. Richards' non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Tom Ricks

1101. At the time of the Holiday Farm Fire, Tom Ricks owned real and personal property located at 90421 Mountain View Lane, Leaburg, Oregon and within the Holiday Farm Fire Area.

1102. The Holiday Farm Fire destroyed Ricks' real and personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. The Fire destroyed a lifetime of work, art, and precious belongings. Ricks has been denied use of the described real and personal property since the time of the Fire, and has incurred costs to inspect, clean, repair, replant,

and/or restore the real and personal property to its original condition.

1103. The market value of the property has been significantly reduced.

1104. Because of the Fire, Rick incurred costs and expenses necessary to secure and maintain alternative housing.

1105. Ricks' economic losses are currently estimated as set forth in Exhibit A.

1106. Ricks inhaled smoke and ash from the Fire, causing respiratory distress, headaches, sore throat from heavy smoke and ash from the Fire. He also suffered cuts, scrapes, bruises, strains and sprains while evacuating from the Fire.

1107. Tom Ricks non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Thomas Roberts

1108. At the time of the Holiday Farm Fire, Roberts owned real and personal property located at 52511 McKenzie Highway, #20, Blue River, Oregon 97413 and within the Holiday Farm Fire Area.

1109. The Holiday Farm Fire destroyed Thomas' real and personal property, including a mobile home,

1110. Thomas has been denied use of the damaged or destroyed real and personal property since the time of the Fire, and has incurred costs to replace, inspect, clean, repair, replant, and/or restore his real and personal property to its original condition.

1111. The market value of his property has been significantly reduced.

1112. Because of the Fire, Thomas has incurred costs and expenses necessary to secure and maintain alternative housing.

1113. Thomas' economic losses are currently estimated as set forth in Exhibit A.

Carl Roderick

1114. At the time of the Holiday Farm Fire, Roderick resided and maintained personal property at 52511 McKenzie Highway, Space 1, Blue River, Oregon 97413 and within the Holiday Farm Fire Area.

1115. The Holiday Farm Fire damaged or destroyed Roderick's personal property, including a manufactured home and all contents, a shop, two sheds, a 1996 Ford F150 truck with canopy and tools, a 1965 Chevrolet truck, fishing boat, 2008 Ford F350, and two quad motorcycles. Roderick has been denied use of the damaged or destroyed personal property since the time of the Fire, and has incurred costs to inspect, replace, clean, repair, and/or restore his personal property to its original condition.

1116. Because of the Fire, Roderick has incurred costs and expenses necessary to secure and maintain alternative housing.

1117. Roderick's economic losses are currently estimated as set forth in Exhibit A.

1118. Roderick inhaled smoke and ash from the Fire causing respiratory distress, sore throat, sinus issues, and headaches. He also burned his left foot in the Fire.

1119. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

1120. Roderick's non-economic losses are currently estimated to not exceed the figure set forth in Exhibit A.

Robbin Roderick

1121. At the time of the Holiday Farm Fire, Roderick resided and maintained personal property at 52511 McKenzie Highway, Space 1, Blue River, Oregon 97413 and within the Holiday Farm Fire Area.

1122. The Holiday Farm Fire damaged or destroyed Roderick's personal property, including a manufactured home and all contents, a shop, two sheds, a 1996 Ford F150 truck with canopy and tools, a 1965 Chevrolet truck, fishing boat, 2008 Ford F350, and two quad motorcycles. Roderick has been denied use of the damaged or destroyed personal property since the time of the Fire, and has incurred costs to inspect, replace, clean, repair, and/or restore his personal property to its original condition.

1123. Because of the Fire, Roderick has incurred costs and expenses necessary to secure and maintain alternative housing.

1124. Roderick's economic losses are currently estimated as set forth in Exhibit A.

1125. Roderick inhaled smoke and ash causing respiratory distress, sore throat, sinus issues, nausea, and headaches.

1126. She has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

1127. Roderick's non-economic losses are currently estimated to not exceed the figure set forth in Exhibit A.

Jack T. Rose

1128. At the time of the Holiday Farm Fire, Rose owned real and personal property located at 90485 Mountain View Lane, Leaburg, Oregon 97489 and within the Holiday Farm Fire Area.

1129. The Holiday Farm Fire destroyed Rose's real and personal property, including his home, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Rose has been denied use of the damaged or destroyed real and personal property since the time of the Fire, and has incurred costs to replace, inspect, clean, repair, replant, and/or restore his real and personal property to its original condition.

1130. The market value of his property has been significantly reduced.

1131. Because of the Fire, Rose has incurred costs and expenses necessary to secure and maintain alternative housing.

1132. Rose's economic losses are currently estimated as set forth in Exhibit A.

1133. Rose inhaled smoke and ash causing respiratory distress, sore throat, sinus problems, and headaches.

1134. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

1135. Rose's non-economic losses are currently estimated to not exceed the figure set forth in Exhibit A.

Judith Rose

1136. At the time of the Holiday Farm Fire, Judith resided at real property owned by the Rose Joint Trust, located at 90485 Mountain View Lane, Leaburg, Oregon, and within the Holiday Farm Fire Area.

1137. Rose maintained a substantial amount of personal property at the residence.

1138. The Holiday Farm Fire damaged Rose's personal property and denied her the use and her right to occupy the described real personal property since the time of the Fire.

1139. Because of the Fire, Rose has incurred costs and expenses necessary to secure and maintain alternative housing.

1140. Rose's economic losses are currently estimated as set forth in Exhibit A.

1141. Rose inhaled smoke and ash from the fire, causing sore throat, headaches, sore eyes, and sinus problems.

1142. She has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

1143. Rose's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Lynette Sanders

1144. At the time of the Holiday Farm Fire, Lynette Sanders owned real and personal property located at 54432 McKenzie Highway #18, Blue River, Oregon and within the Holiday Farm Fire Area.

1145. The Holiday Farm Fire destroyed Sanders' real and personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Sanders has been denied use of the described real and personal property since the time of the Fire, and has incurred costs to inspect, clean, repair, replant, and/or restore her real and personal property to its original condition.

1146. The market value of her property has been significantly reduced.

1147. Sanders' economic losses are currently estimated as set forth in Exhibit A..

1148. Sanders inhaled smoke and ash from the Fire, which continues to cause her sinus problems, headaches, sore eyes and throat. During her attempt to clean up the debris from her burned home, she suffered sciatic nerve pain and planter fasciitis.

1149. She has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

1150. Sanders' non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Frances Sangermano

1151. At the time of the Holiday Farm Fire, Sangermano owned real and personal property

located at 49798 McKenzie Highway, Vida, Oregon 97488 and within the Holiday Farm Fire Area.

1152. The Holiday Farm Fire destroyed Sangermano's real and personal property, including her home, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Sangermano has been denied use of the damaged or destroyed real and personal property since the time of the Fire, and has incurred costs to replace, inspect, clean, repair, replant, and/or restore her real and personal property to its original condition.

1153. The market value of her property has been significantly reduced.

1154. Because of the Fire, Sangermano has incurred costs and expenses necessary to secure and maintain alternative housing.

1155. Sangermano's economic losses are currently estimated as set forth in Exhibit A.

1156. Sangermano inhaled smoke and ash causing respiratory distress, sore throat, and headaches.

1157. She has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

1158. Sangermano's non-economic losses are currently estimated to not exceed the figure set forth in Exhibit A.

Lou Sangermano

1159. At the time of the Holiday Farm Fire, Sangermano owned real and personal property located at 49798 McKenzie Highway, Vida, Oregon 97488 and within the Holiday Farm Fire Area.

1160. The Holiday Farm Fire destroyed Sangermano's real and personal property, including his home, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Sangermano has been denied use of the damaged or destroyed real and personal property since the time

of the Fire, and has incurred costs to replace, inspect, clean, repair, replant, and/or restore his real and personal property to its original condition.

1161. The market value of his property has been significantly reduced.

1162. Because of the Fire, Sangermano has incurred costs and expenses necessary to secure and maintain alternative housing.

1163. Sangermano's economic losses are currently estimated as set forth in Exhibit A.

1164. Sangermano inhaled smoke and ash causing respiratory distress, sore throat, and headaches.

1165. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

1166. Sangermano's non-economic losses are currently estimated to not exceed the figure set forth in Exhibit A.

Ellen Sather

1167. At the time of the Holiday Farm Fire, Sather owned real and personal property located at 52986 McKenzie Highway, Blue River, Oregon 97413 and within the Holiday Farm Fire Area.

1168. The Holiday Farm Fire destroyed Sather's real and personal property, her home, other structures and appurtenances, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Sather has been denied use of the damaged or destroyed real and personal property since the time of the Fire, and has incurred costs to replace, inspect, clean, repair, replant, and/or restore her real and personal property to its original condition.

1169. The market value of her property has been significantly reduced.

1170. Because of the Fire, Sather has incurred costs and expenses necessary to secure and

maintain alternative housing.

1171. Sather's economic losses are currently estimated as set forth in Exhibit A.

McKenna Schmitt

1172. At the time of the Holiday Farm Fire, Schmitt resided and maintained personal property within the Holiday Farm Fire Area.

1173. The Holiday Farm Fire damaged or destroyed Schmitt's personal property. Schmitt has been denied use of the damaged or destroyed personal property since the time of the Fire, and has incurred costs to inspect, replace, clean, repair, and/or restore her personal property to its original condition.

1174. Because of the Fire, Schmitt incurred costs and expenses necessary to secure and maintain alternative housing.

1175. Schmitt's economic losses are currently estimated as set forth in Exhibit A.

1176. Schmitt inhaled smoke and ash causing respiratory distress, sore throat, headaches, and upset stomach.

1177. She has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

1178. Schmitt's non-economic losses are currently estimated to not exceed the figure set forth in Exhibit A.

Majeed ("Jim") Sharifie

1179. At the time of the Holiday Farm Fire, Majeed ("Jim") Sharifie owned real and personal property located at 47207 Goodpasture Road, Vida, Oregon, and within the Holiday Farm Fire Area.

1180. The Holiday Farm Fire destroyed Sharifie's real and personal property, and a significant

amount of timber, landscaping, decorative trees, and other beneficial foliage. He has been denied use of the described real and personal property since the time of the Fire, and has incurred costs to inspect, clean, repair, replant, and/or restore his real and personal property to its original condition.

1181. The market value of his property has been significantly reduced.

1182. Because of the Fire, Sharifie incurred costs and expenses necessary to secure and maintain alternative housing.

1183. Sharifie's economic losses are currently estimated as set forth in Exhibit A.

1184. He inhaled smoke and ash from the Fire, causing headaches and eye irritation.

1185. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

1186. Sharifie's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Kaleb Simpson-Randall

1187. At the time of the Holiday Farm Fire, Kaleb Simpson-Randall lived with David Simpson at 45135 McKenzie Highway, Leaburg, Oregon 97489 and within the Holiday Farm Fire Area.

1188. Kaleb Simpson-Randall inhaled smoke and ash, causing respiratory distress, sore throat, and headaches.

1189. He has also been displaced and required to move to an alternative residence because of the Fire. Simpson-Randall has incurred costs and expenses necessary to secure and maintain alternative housing.

1190. Simpson-Randall's economic losses are currently estimated as set forth in Exhibit A.

1191. He has experienced stress, fear, inconvenience, and emotional and mental distress

because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

1192. Kaleb Simpson-Randall's non-economic losses are currently estimated to not exceed the figure set forth in Exhibit A.

Jared Simmons

1193. At the time of the Holiday Farm Fire, Jared Simmons owned 36.04 acres of harvestable merchantable timber land within the Holiday Farm Fire Area.

1194. All 36.04 acres of merchantable timber on Simmons' property were burned and destroyed by the Holiday Farm Fire.

1195. To mitigate the damages, Simmons logged the burned timber from the property and sold the salvaged timber in a commercially reasonable sale.

1196. The damage caused by the Holiday Farm Fire also required inspection, clean-up, replanting, and other services necessary to remove and dispose of unmarketable burned timber remaining on the site and return it to its original condition and replanting the property.

1197. Simmons' current economic losses are set forth in Exhibit A.

1198. Simmons also inhaled smoke and ash, causing headaches, respiratory problems, and eye irritation.

1199. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

1200. Simmons' non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Kathryn Simmons

1201. At the time of the Holiday Farm Fire, Kathryn Simmons owned 36.04 acres of

harvestable merchantable timber land within the Holiday Farm Fire Area.

1202. All 36.04 acres of merchantable timber on Simmons' property were burned and destroyed by the Holiday Farm Fire.

1203. To mitigate the damages, Simmons' spouse logged the burned timber from the property and sold the salvaged timber in a commercially reasonable sale.

1204. The damage caused by the Holiday Farm Fire also required inspection, clean-up, replanting, and other services necessary to remove and dispose of unmarketable burned timber remaining on the site and return it to its original condition and replanting the property.

1205. Simmons' current economic losses are set forth in Exhibit A.

1206. Simmons also inhaled smoke and ash from the Fire, causing headaches, respiratory problems, and eye irritation.

1207. She has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

1208. Kathryn Simmons non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

David Simpson

1209. At the time of the Holiday Farm Fire, David Simpson resided at real property he owned located at 45135 McKenzie Highway, Leaburg, Oregon, and within the Holiday Farm Fire Area. Simpson had a substantial amount of personal property at the residence.

1210. The Holiday Farm Fire destroyed the real and personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Simpson has been denied use of the described real and personal property since the time of the Fire, and has incurred costs to inspect,

clean, repair, replant, and/or restore the real and personal property to its original condition.

1211. The market value of the property has been significantly reduced.

1212. Because of the Fire, Simpson incurred costs and expenses necessary to secure and maintain alternative housing.

1213. Simpson's economic losses are currently estimated as set forth in Exhibit A.

1214. Simpson inhaled smoke and ash causing respiratory distress and headaches. He has also suffered cuts, bruises, and scrapes from evacuating during the Fire and cleanup efforts afterward.

1215. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

1216. Simpson's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Glenn Sims

1217. At the time of the Holiday Farm Fire, Glenn Sims resided at property owned by Linda Prout located at 90405 Mountain View Lane, Walterville, Oregon, and within the Holiday Farm Fire Area. Sims maintained personal property at the residence and grounds.

1218. The Holiday Farm Fire damaged or destroyed Sims' personal property and denied him the use of and right to occupy the described real property since the time of the Fire.

1219. Because of the Fire, Sims incurred costs and expenses necessary to secure and maintain alternative housing.

1220. Sims' economic losses are currently estimated as set forth in Exhibit A.

Ronald Snyder

1221. At the time of the Holiday Farm Fire, Snyder resided and maintained personal property

within the Holiday Farm Fire Area.

1222. The Holiday Farm Fire destroyed Snyder's personal property, including a library, studio equipment, art, 300 artifacts, a storage shed, and all contents. Snyder has been denied use of the damaged or destroyed personal property since the time of the Fire, and has incurred costs to inspect, replace, clean, repair, and/or restore his personal property to its original condition.

1223. Because of the Fire, Snyder has incurred costs and expenses necessary to secure and maintain alternative housing.

1224. Snyder's economic losses are currently estimated as set forth in Exhibit A.

Patricia Spady

1225. At the time of the Holiday Farm Fire, Patricia Spady resided at real property owned by Earthscapes of Oregon, LLC, and within the Holiday Farm Fire Area. Spady maintained a substantial amount of personal property at one or more of the Earthscapes' properties.

1226. The Holiday Farm Fire damaged Spady's personal property and denied her the use and her right to occupy the described real personal property since the time of the Fire.

1227. Because of the Fire, Spady incurred costs and expenses necessary to secure and maintain alternative housing.

1228. Spady's economic losses are currently estimated as set forth in Exhibit A.

1229. Spady inhaled smoke and ash from the Fire, causing headaches, eye irritation and sore throat.

1230. She has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

1231. Spady's non-economic losses are currently estimated not to exceed the figure set forth in

Exhibit A.

Brandon Stevens

1232. At the time of the Holiday Farm Fire, Stevens resided and maintained personal property within the Holiday Farm Fire Area.

1233. The Holiday Farm Fire damaged or destroyed Stevens' personal property. He has been denied use of the damaged or destroyed personal property since the time of the Fire, and has incurred costs to inspect, replace, clean, repair, and/or restore his personal property to its original condition.

1234. Because of the Fire, Stevens has incurred costs and expenses necessary to secure and maintain alternative housing.

1235. Stevens' economic losses are currently estimated as set forth in Exhibit A.

1236. Stevens inhaled smoke and ash causing respiratory distress, sore throat, and headaches.

1237. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

1238. Stevens' non-economic losses are currently estimated to not exceed the figure set forth in Exhibit A.

Maria Sughroue

1239. At the time of the Holiday Farm Fire, Maria Sughroue resided at real property owned by Mark Beaubien, located at 46024 Gate Creek Road, Vida, Oregon 97488 and within the Holiday Farm Fire Area.

1240. The Holiday Farm Fire destroyed Sughroue's personal property. She has been denied use of the destroyed personal property since the time of the Fire, and has incurred costs to replace, inspect, clean, repair, replant, and/or restore her real and personal property to its original condition.

1241. Because of the Fire, Sughroue has incurred costs and expenses necessary to secure and maintain alternative housing.

1242. Sughroue's economic losses are currently estimated as set forth in Exhibit A.

1243. Sughroue inhaled smoke and ash causing respiratory distress, sore eyes and throat, and headaches. Sughroue received cuts and bruises, and experienced muscle and/or joint strain from cutting down trees and going through her family's burnt personal belongings.

1244. She has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

1245. Sughroue's non-economic losses are currently estimated to not exceed the figure set forth in Exhibit A.

Seth Sughroue

1246. At the time of the Holiday Farm Fire, Seth Sughroue resided at real property owned by Mark Beaubien, located at 46024 Gate Creek Road, and within the Holiday Farm Fire Area.

1247. Sughroue maintained a substantial amount of personal property at the residence.

1248. The Holiday Farm Fire damaged Sughroue's personal property and denied him the use and his right to occupy the described real personal property since the time of the Fire.

1249. Because of the Fire, Sughroue incurred costs and expenses necessary to secure and maintain alternative housing.

1250. Sughroue's economic losses are currently estimated as set forth in Exhibit A.

1251. Sughroue inhaled smoke and ash causing respiratory distress, sore throat, and headaches.

1252. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

1253. Sughroue's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Amie Swallow

1254. At the time of the Holiday Farm Fire, Swallow owned real and personal property located at 90894 Angels Flight Road, Walterville, Oregon 97489 and within the Holiday Farm Fire Area.

1255. The Holiday Farm Fire damaged or destroyed Swallow's real and personal property, including a hay barn, roof, home, truck, 3000 bales of hay, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Swallow has been denied use of the damaged or destroyed real and personal property since the time of the Fire, and has incurred costs to replace, inspect, clean, repair, replant, and/or restore her real and personal property to its original condition.

1256. The market value of her property has been significantly reduced.

1257. Because of the Fire, Swallow has incurred costs and expenses necessary to secure and maintain alternative housing.

1258. Swallow's economic losses are currently estimated as set forth in Exhibit A.

1259. Swallow inhaled smoke and ash causing respiratory distress, sore throat, and breathing problems. She also experienced burns on her arms because of the Fire.

1260. She has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

1261. Swallow's non-economic losses are currently estimated to not exceed the figure set forth in Exhibit A.

James Swallow

1262. At the time of the Holiday Farm Fire, Swallow owned real and personal property located at 90894 Angels Flight Road, Walterville, Oregon 97489 and within the Holiday Farm Fire Area.

1263. The Holiday Farm Fire damaged or destroyed Swallow's real and personal property, including a hay barn, roof, home, truck, 3000 bales of hay, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Swallow has been denied use of the damaged or destroyed real and personal property since the time of the Fire, and has incurred costs to replace, inspect, clean, repair, replant, and/or restore his real and personal property to its original condition.

1264. The market value of his property has been significantly reduced.

1265. Because of the Fire, Swallow has incurred costs and expenses necessary to secure and maintain alternative housing.

1266. Swallow's economic losses are currently estimated as set forth in Exhibit A.

1267. Swallow inhaled smoke and ash causing respiratory distress, sore throat, and breathing problems. He also experienced burns on his arms because of the Fire.

1268. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

1269. Swallow's non-economic losses are currently estimated to not exceed the figure set forth in Exhibit A.

Dwayne Swezey

1270. At the time of the Holiday Farm Fire, Dwayne Swezey owned real and personal property located at 54432 McKenzie Highway, Lot 10, Blue River, Oregon and within the Holiday Farm Fire Area.

1271. The Holiday Farm Fire destroyed Swezey's real and personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Swezey has been denied use of the described real and personal property since the time of the Fire, and has incurred costs to inspect, clean, repair, replant, and/or restore the real and personal property to its original condition.

1272. The market value of the property has been significantly reduced.

1273. Because of the Fire, Swezey incurred costs and expenses necessary to secure and maintain alternative housing.

1274. Swezey's economic losses are currently estimated as set forth in Exhibit A.

1275. Swezey inhaled smoke and ash, causing headaches, eye irritation and sore throat.

1276. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

1277. Swezey's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Lana Swezey

1278. At the time of the Holiday Farm Fire, Lana Swezey owned real and personal property located at 54432 McKenzie Highway, Lot 10, Blue River, Oregon and within the Holiday Farm Fire Area.

1279. The Holiday Farm Fire destroyed Lana Swezey real and personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Lana Swezey has been denied use of the described real and personal property since the time of the Fire, and has incurred costs to inspect, clean, repair, replant, and/or restore the real and personal property to its original condition.

1280. The market value of the property has been significantly reduced.

1281. Because of the Fire, Swezey incurred costs and expenses necessary to secure and maintain alternative housing.

1282. Swezey's economic losses are currently estimated as set forth in Exhibit A.

1283. Swezey inhaled smoke and ash, causing headaches, eye irritation and sore throat.

1284. She has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

1285. Swezey's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

James Terborg

1286. At the time of the Holiday Farm Fire, Terborg owned real and personal property located at 47145 Goodpasture Road, Vida, Oregon 97488 and within the Holiday Farm Fire Area.

1287. The Holiday Farm Fire destroyed Terborg's real and personal property, including a home with garage, an "A" frame structure, dog kennel, covered picnic area, garden shed, chicken coop, wood storage buildings, garden fruit trees, 2.2 acres of timber and trees, and a significant amount of landscaping and other beneficial foliage. Terborg has been denied use of the damaged or destroyed real and personal property since the time of the Fire, and has incurred costs to replace, inspect, clean, repair, replant, and/or restore his real and personal property to its original condition.

1288. The market value of his property has been significantly reduced.

1289. Because of the Fire, Terborg has incurred costs and expenses necessary to secure and maintain alternative housing.

1290. Terborg's economic losses are currently estimated as set forth in Exhibit A.

1291. Terborg inhaled smoke and ash causing respiratory distress, headaches, and stomach upset. He also received cuts on his hands because of the Fire and its aftermath.

1292. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

1293. Terborg's non-economic losses are currently estimated to not exceed the figure set forth in Exhibit A.

Jane Terry

1294. At the time of the Holiday Farm Fire, Jane Terry resided at real property owned by Whispering Pines Oregon LLC, located at 46747 Goodpasture Road, Vida, Oregon, and within the Holiday Farm Fire Area.

1295. Terry maintained a substantial amount of personal property at the residence.

1296. The Holiday Farm Fire damaged Terry's personal property and denied her the use and her right to occupy the described real personal property since the time of the Fire.

1297. Because of the Fire, Terry incurred costs and expenses necessary to secure and maintain alternative housing.

1298. Terry's economic losses are currently estimated as set forth in Exhibit A.

1299. Terry inhaled smoke and ash from the Fire, causing headaches, eye irritation and sore throat.

1300. She has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

1301. Terry's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Joan Thompson

1302. At the time of the Holiday Farm Fire, Joan Thompson occupied a residence located on real property owned by the Thompson Family Trust and owned personal property located within the residence, all at 47011 Goodpasture Road, Vida, Oregon and within the Holiday Farm Fire Area.

1303. The Holiday Farm Fire destroyed the residence and Thompson's personal property. Thompson has been denied use of the described real and personal property since the time of the Fire.

1304. Because of the Fire, Thompson incurred costs and expenses necessary to secure and maintain alternative housing.

1305. Thompson's economic losses are currently estimated as set forth in Exhibit A.

1306. Thompson inhaled smoke and ash from the Fire, causing headaches, eye irritation and sore throat.

1307. She has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

1308. Thompson's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Debra J. Veralrud

1309. At the time of the Holiday Farm Fire, Debra J. Veralrud owned real and personal property located at 47213 Goodpasture Road, Vida, Oregon and within the Holiday Farm Fire Area.

1310. The Holiday Farm Fire destroyed Veralrud's real and personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Veralrud has been denied use of the described real and personal property since the time of the Fire, and has incurred costs to inspect, clean, repair, replant, and/or restore the real and personal property to its original condition.

1311. The market value of the property has been significantly reduced.

1312. Because of the Fire, Veralrud incurred costs and expenses necessary to secure and maintain alternative housing.

1313. Veralrud's economic losses are currently estimated as set forth in Exhibit A.

Gregory E. Veralrud

1314. At the time of the Holiday Farm Fire, Gregory E. Veralrud owned real and personal property located at 47213 Goodpasture Road, Vida, Oregon and within the Holiday Farm Fire Area.

1315. The Holiday Farm Fire destroyed Veralrud's real and personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Veralrud has been denied use of the described real and personal property since the time of the Fire, and has incurred costs to inspect, clean, repair, replant, and/or restore the real and personal property to its original condition.

1316. The market value of the property has been significantly reduced.

1317. Because of the Fire, Veralrud incurred costs and expenses necessary to secure and maintain alternative housing.

1318. Veralrud's economic losses are currently estimated as set forth in Exhibit A.

Michele Victor

1319. At the time of the Holiday Farm Fire, Victor owned real and personal property located at 47964 McKenzie Highway, Vida, Oregon 97488 and within the Holiday Farm Fire Area.

1320. The Holiday Farm Fire destroyed Victor's real and personal property, including her home and all contents, sixteen trees, outbuilding, woodshed, septic system, and a significant amount of landscaping and other beneficial foliage. Victor has been denied use of the damaged or destroyed real and personal property since the time of the Fire, and has incurred costs to replace, inspect, clean, repair,

replant, and/or restore her real and personal property to its original condition.

1321. The market value of her property has been significantly reduced.

1322. Because of the Fire, Victor has incurred costs and expenses necessary to secure and maintain alternative housing.

1323. Victor's economic losses are currently estimated as set forth in Exhibit A.

1324. Victor inhaled smoke and ash causing respiratory distress, sore throat, headaches, and upset stomach.

1325. She has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

1326. Victor's non-economic losses are currently estimated to not exceed the figure set forth in Exhibit A.

James Watts

1327. At the time of the Holiday Farm Fire, James Watts owned real and personal property located at 50493 McKenzie Highway, Vida, Oregon and within the Holiday Farm Fire Area.

1328. The Holiday Farm Fire destroyed Watts's real and personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. He has been denied use of the described real and personal property since the time of the Fire, and has incurred costs to inspect, clean, repair, replant, and/or restore his real and personal property to its original condition.

1329. The market value of his property has been significantly reduced.

1330. Because of the Fire, Watts incurred costs and expenses necessary to secure and maintain alternative housing.

1331. Watts' economic losses are currently estimated as set forth in Exhibit A.

1332. Watts was hit by burning debris and fell down his front steps as he evacuated his home during the Fire. The Fire burned his hair, head, neck, arms, and back and he was bruised badly when he fell, and tore a meniscus in his right knee, all while trying to evacuate.

1333. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

1334. Watts's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Lee Weichselbaum

1335. At the time of the Holiday Farm Fire, Lee Weichselbaum owned real and personal property located at 91303 Blue River Road, Blue River, Oregon and within the Holiday Farm Fire Area.

1336. The Holiday Farm Fire destroyed Lee Weichselbaum real and personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Weichselbaum has been denied use of the described real and personal property since the time of the Fire, and has incurred costs to inspect, clean, repair, replant, and/or restore the real and personal property to its original condition.

1337. The market value of the property has been significantly reduced.

1338. Because of the Fire, Weichselbaum incurred costs and expenses necessary to secure and maintain alternative housing.

1339. Weichselbaum's economic losses are currently estimated as set forth in Exhibit A.

1340. Weichselbaum inhaled smoke and ash from the Fire causing respiratory distress, headaches, and sore throat. He suffered a left abdominal hernia, severely injuring his osteoarthritic hip, badly bruised his right bicep, and hurt his right shoulder when attempting to move heavy objects after

the Fire while trying to remove debris and salvage his personal belongings.

1341. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

1342. Weichselbaum's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Merideth Wendland

1343. At the time of the Holiday Farm Fire, Merideth Wendland owned real and personal property located at 53970 McKenzie Highway, and 52972 McKenzie Highway, Blue River, Oregon 97413.

1344. The Holiday Farm Fire destroyed Wendland's real and personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Wendland has been denied use of the described real and personal property since the time of the Fire, and has incurred costs to inspect, clean, repair, replant, and/or restore her real and personal property to its original condition.

1345. The market value of her property has been significantly reduced.

1346. Because of the Fire, Wendland incurred costs and expenses necessary to secure and maintain alternative housing.

1347. Wendland's economic losses are currently estimated as set forth in Exhibit A.

1348. Wendland inhaled smoke and ash from the fire, causing respiratory distress, sore throat, headaches, and fatigue.

1349. She has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

1350. Wendland's non-economic damages are estimated not to exceed the figure set forth in Exhibit A.

Orville Wilkerson

1351. At the time of the Holiday Farm Fire, Orville Wilkerson owned real and personal property located at 45141 McKenzie Highway, Leaburg, Oregon, and within the Holiday Farm Fire Area.

1352. The Holiday Farm Fire destroyed Wilkerson's residence, numerous other structures and outbuildings, and personal property, a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Wilkerson has been denied use of the real and personal property since the time of the Fire and has incurred costs to inspect, clean, repair, replant, and/or restore the real and personal property to its original condition.

1353. The market value of the property has been significantly reduced.

1354. Because of the Fire, Wilkerson incurred costs and expenses necessary to secure and maintain alternative housing.

1355. Wilkerson's economic losses are currently estimated as set forth in Exhibit A.

1356. Wilkerson suffered cuts and scrapes when he returned to the property after the Fire to remove debris and try to salvage his belongings.

1357. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

1358. Wilkerson's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Tina Wilkerson

1359. At the time of the Holiday Farm Fire, Tina Wilkerson owned real and personal property located at 45141 McKenzie Highway, Leaburg, Oregon, and within the Holiday Farm Fire Area.

1360. The Holiday Farm Fire destroyed Wilkerson's residence, numerous other structures and outbuildings, and personal property, a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Wilkerson has been denied use of the real and personal property since the time of the Fire and has incurred costs to inspect, clean, repair, replant, and/or restore the real and personal property to its original condition.

1361. The market value of the property has been significantly reduced.

1362. Because of the Fire, Wilkerson incurred costs and expenses necessary to secure and maintain alternative housing.

1363. Wilkerson's economic losses are currently estimated as set forth in Exhibit A.

1364. At the time of the Fire, Wilkerson was home with her two dogs and her husband was in Louisiana. She inhaled smoke and ash before and during evacuation, suffered extreme coughing and her eyes burned because her home was filled with smoke from the Fire. She suffered severe sinus problems and respiratory distress from the smoke and ash. She injured her back and had headaches when she returned to the property after the Fire to remove debris and salvage her belongings.

1365. Wilkerson suffers from anxiety, grief, fear, and has nightmares and panic attacks because of the Fire and is under a doctor's care. She has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

1366. Wilkerson's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Linda K. Williams

1367. At the time of the Holiday Farm Fire, Linda K. Williams owned real and personal property located at 44949 Leaburg Dam Road, Leaburg, Oregon, and within the Holiday Farm Fire Area.

1368. The Holiday Farm Fire destroyed Williams' residence, damaged, or destroyed numerous other structures and outbuildings and personal property, destroyed a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Williams has been denied use of her real and personal property since the time of the Fire and has incurred costs to inspect, clean, repair, replant, and/or restore her real and personal property to its original condition.

1369. The market value of her property has been significantly reduced.

1370. Because of the Fire, Williams incurred costs and expenses necessary to secure and maintain alternative housing.

1371. Williams' economic losses are currently estimated as set forth in Exhibit A.

1372. Williams hyper-extended her lower back on October 4, 2020 when going through the burn pile of her home trying to remove debris and salvage an urn which held her aunt's ashes, causing muscle spasms, sciatica, inflammation in her neck, and left shoulder, resulting in daily pain. She also suffers from insomnia, headaches and has sought treatment from Joint Chiropractic Care on 12 occasions because of her injuries from the Fire.

1373. She has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

1374. Williams' non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Dan Wilson

1375. At the time of the Holiday Farm Fire, Dan Wilson owned real and personal property located at tax map 16452300 and lot 2700 and within the Holiday Farm Fire Area.

1376. Fire destroyed the timber lot located at tax map 16452300 and Lot 2700, including trees, landscaping, loss of merchantable timber and personal property.

1377. The Fire also caused business losses and expenses for debris removal.

1378. Because of the Fire, Wilson incurred costs and expenses necessary to secure and maintain alternative housing.

1379. Wilson's economic losses are currently estimated as set forth in Exhibit A.

1380. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

1381. Wilson's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Marilee Wilson

1382. At the time of the Holiday Farm Fire, Marilee Wilson owned real and personal property located at tax map 16452300 and lot 2700 and within the Holiday Farm Fire Area.

1383. Fire destroyed the timber lot located at tax map 16452300 and Lot 2700, including trees, landscaping, loss of merchantable timber and personal property.

1384. The Fire also caused business losses and expenses for debris removal.

1385. Because of the Fire, Wilson incurred costs and expenses necessary to secure and maintain alternative housing.

1386. Wilson's economic losses are currently estimated as set forth in Exhibit A.

1387. She has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

1388. Wilson's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Kirk Wright

1389. At the time of the Holiday Farm Fire, Wright owned real and personal property located at 90987 Angels Flight Road, Leaburg, Oregon 97489 and within the Holiday Farm Fire Area.

1390. The Holiday Farm Fire destroyed Wright's real and personal property. Wright has been denied use of the damaged or destroyed real and personal property since the time of the Fire, and has incurred costs to replace, inspect, clean, repair, replant, and/or restore his real and personal property to its original condition.

1391. The market value of his property has been significantly reduced.

1392. Because of the Fire, Wright has incurred costs and expenses necessary to secure and maintain alternative housing.

1393. Wright's economic losses are currently estimated as set forth in Exhibit A.

1394. Wright inhaled smoke and ash causing respiratory distress, sore throat, and headaches.

1395. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

1396. Wright's non-economic losses are currently estimated to not exceed the figure set forth in Exhibit A.

Scott Wright

1397. At the time of the Holiday Farm Fire, Wright resided and maintained personal property at

54655 McKenzie River Drive, #15 and within the Holiday Farm Fire Area.

1398. The Holiday Farm Fire destroyed Wright's real and personal property, including a motor home, tires, freezer, groceries and food, clothing, photographs, tools, and gasoline. Wright has been denied use of the damaged or destroyed real and personal property since the time of the Fire, and has incurred costs to replace, inspect, clean, repair, replant, and/or restore his real and personal property to its original condition.

1399. The market value of his property has been significantly reduced.

1400. Because of the Fire, Wright has incurred costs and expenses necessary to secure and maintain alternative housing.

1401. Wright's economic losses are currently estimated as set forth in Exhibit A.

1402. Wright inhaled smoke and ash from the Fire causing respiratory distress, sore throat, and headaches. He has developed COPD from the inhaled smoke and ash and sustained severe and permanently disabling injuries to his right arm and hand. He is now on permanent disability from his injuries and unable to work.

1403. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

1404. Wright's non-economic losses are currently estimated to not exceed the figure set forth in Exhibit A.

Craig Van Young

1405. At the time of the Holiday Farm Fire, Craig Van Young owned real and personal property located at 50463 McKenzie Highway, Vida, Oregon, and within the Holiday Farm Fire Area.

1406. The Holiday Farm Fire destroyed Young's residence, damaged, or destroyed numerous

other structures and outbuildings and personal property, destroyed a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Young has been denied use of his real and personal property since the time of the Fire and has incurred costs to inspect, clean, repair, replant, and/or restore his real and personal property to its original condition.

1407. The market value of his property has been significantly reduced.

1408. Because of the Fire, Young incurred costs and expenses necessary to secure and maintain alternative housing.

1409. Young's economic losses are currently estimated as set forth in Exhibit A.

1410. Young inhaled smoke and ash from the Fire, causing headaches, eye irritation and sore throat, and which worsened his asthma and resulted in a fourfold increase in the amount of asthma medication required to treat his condition.

1411. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

1412. Young's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Miler Zamora-Fraser

1413. At the time of the Holiday Farm Fire, Zamora-Fraser resided and maintained personal property at 48065 McKenzie Highway, Vida, Oregon 97488 and within the Holiday Farm Fire Area.

1414. The Holiday Farm Fire destroyed Zamora-Fraser's personal property. She has been denied use of the damaged or destroyed personal property since the time of the Fire, and has incurred costs to inspect, replace, clean, repair, and/or restore her personal property to its original condition.

1415. Because of the Fire, Zamora-Fraser has incurred costs and expenses necessary to secure

and maintain alternative housing.

1416. Zamora-Fraser's economic losses are currently estimated as set forth in Exhibit A.

1417. Zamora-Fraser inhaled smoke and ash from the Fire causing respiratory distress, sore throat, headaches, and stomach upset .

1418. She has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

1419. Zamora-Fraser's non-economic losses are currently estimated to not exceed the figure set forth in Exhibit A.

Carl Zietz

1420. At the time of the Holiday Farm Fire, Carl Zietz resided at real property owned by the Zietz Living Trust and maintained personal property, all at 91260 Blue River Road, Blue River, Oregon, and within the Holiday Farm Fire Area.

1421. The Holiday Farm Fire destroyed all Zietz's personal property. Zietz has also been denied use of the described real and personal property since the time of the Fire.

1422. Because of the Fire, Zietz incurred costs and expenses necessary to secure and maintain alternative housing.

1423. Zietz's economic losses are currently estimated as set forth in Exhibit A.

1424. Zietz sprained his knee and ankle while onsite investigating his losses from the Fire.

1425. He has experienced stress, fear, inconvenience, anxiety and depression, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

1426. Zietz's non-economic losses are currently estimated not to exceed the figure set forth in

Exhibit A.

Kelly Zimmerman

1427. At the time of the Holiday Farm Fire, Kelly Zimmerman resided at real property owned by Kathleen Nesslin and maintained personal property there, all at 90953 Angels Flight Road, Walterville, Oregon, and within the Holiday Farm Fire Area.

1428. The Holiday Farm Fire damaged Zimmerman's personal property and denied him the use and his right to occupy the described real personal property since the time of the Fire.

1429. Because of the Fire, Zimmerman incurred costs and expenses necessary to secure and maintain alternative housing.

1430. Zimmerman's economic losses are currently estimated as set forth in Exhibit A.

1431. Zimmerman injured himself by falling and twisting his ankle while evacuating his property during the Fire. He fell on gravel driveway and suffered cuts and scrapes to his hands and knees. He inhaled a heavy amount of smoke and ash from the Fire, causing respiratory distress and coughs producing black mucous for days after he evacuated. He continues to suffer headaches.

1432. He has experienced extreme stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

1433. Zimmerman's non-economic losses are currently estimated not to exceed the figure set forth in Exhibit A.

Archer Family Trust - Charlotte Archer, trustee

1434. At the time of the Holiday Farm Fire, the Archer Family Trust owned real and personal property located at 46141 Goodpasture Road, Vida, Oregon and nearby properties, and within the Holiday Farm Fire Area.

1435. The Holiday Farm Fire destroyed the Trust's property, including two houses, a shop, carport, boat shed, other structures, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. The Trust has been denied use of the described real and personal property since the time of the Fire and has incurred costs to inspect, clean, repair, replant, and/or restore its real and personal property to its original condition.

1436. The market value of its property has been significantly reduced.

1437. Archer Family Trust's economic losses are currently estimated as set forth in Exhibit A.

Dorothy L Behm Family Trust - Jerry Behm, trustee

1438. At the time of the Holiday Farm Fire, the Dorothy L Behm Family Trust owned real and personal property located on undeveloped and unimproved land parcels described as Lane County tax lots 1645210000200, 1645210000401, 1645210000210, 1645210000300 and within the Holiday Farm Fire Area.

1439. The Holiday Farm Fire destroyed the Trust's real and personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. The Trust has been denied use of the described real and personal property since the time of the Fire, and has incurred costs to inspect, clean, repair, replant, and/or restore the real and personal property to its original condition.

1440. The market value of the property has been significantly reduced.

1441. The Trust's economic losses are currently estimated as set forth in Exhibit A.

Dorothy L Behm Marital Trust - Jerry Behm, trustee

1442. At the time of the Holiday Farm Fire, the Dorothy L Behm Marital Trust owned real and personal property located on undeveloped and unimproved land parcels described as Lane County tax lots 1645213400101 and 1645213400200, and within the Holiday Farm Fire Area.

1443. The Holiday Farm Fire destroyed the Trust's real and personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. The Trust has been denied use of the described real and personal property since the time of the Fire, and has incurred costs to inspect, clean, repair, replant, and/or restore the real and personal property to its original condition.

1444. The market value of the property has been significantly reduced.

1445. The Trust's economic losses are currently estimated as set forth in Exhibit A.

Fred Behm FBO Nancy Behm Irrevocable Trust - Jerry Behm, trustee

1446. At the time of the Holiday Farm Fire, the Nancy Behm Irrevocable Trust owned real and personal property located at 91318 Blue River Road, Blue River, Oregon 97413 and within the Holiday Farm Fire Area.

1447. The Holiday Farm Fire damaged or destroyed the Trust's real and personal property, including but not limited to a residence, a two-story pole barn, garage, three-stall horse barn, three pump houses, timber, landscaping, decorative trees, and other beneficial foliage. The Trust has been denied use of its real and personal property since the time of the Fire and has incurred costs to inspect, clean, repair, replant, and/or restore its real and personal property to its original condition.

1448. The market value of its property has been significantly reduced.

1449. The Trust's economic losses are currently estimated as set forth in Exhibit A.

Brooks Family Trust - Karen Brooks, trustee

1450. At the time of the Holiday Farm Fire, the Brooks Family Trust owned real and personal property located at 48808 McKenzie Highway, Vida, Oregon 97488 and within the Holiday Farm Fire Area.

1451. The Holiday Farm Fire destroyed the Trust's real and personal property, including a

house, pumphouse, shop building and fence, drift boat with trailer, timber, landscaping, decorative trees, and other beneficial foliage. The Trust has been denied use of its real and personal property since the time of the Fire and has incurred costs to inspect, clean, repair, replant, and/or restore its real and personal property to its original condition.

1452. The market value of its property has been significantly reduced.

1453. The Trust's economic losses are currently estimated as set forth in Exhibit A.

Carleton T. Coveny Revocable Living Trust - Carleton T. Coveny, trustee

1454. At the time of the Holiday Farm Fire the Carleton T. Coveny Revocable Living Trust ("Coveny Trust") owned real property with structures, timber, and other beneficial foliage located at 55140 McKenzie River Drive, Blue River, Oregon and within the Holiday Farm Fire Area.

1455. The Holiday Farm Fire significantly reduced the marketability of the Coveny Trust's real and personal property and caused loss of revenue from tenants and rentals. The Trust has been denied beneficial use of the described real and personal property at various times since the time of the Fire, it has incurred costs to inspect, clean, repair, and/or restore the property to its original condition.

1456. The market value of the property as an income-producing rental property and as a real property asset has been significantly reduced.

1457. The Coveny Trust's economic losses are currently estimated as set forth in Exhibit A.

Cox Family Trust - George Cox, trustee

1458. At the time of the Holiday Farm Fire, the Cox Family Trust owned real and personal property located at 54432 McKenzie Highway, # 38, Blue River, Oregon, and within the Holiday Farm Fire Area.

1459. The Holiday Farm Fire destroyed Trust's real and personal property, including but not

limited to a shed, water, and electrical hook-ups, a picnic table, timber, landscaping, decorative trees, and other beneficial foliage. The Trust has been denied use of the real and personal property since the time of the Fire and has incurred costs to inspect, clean, repair, replant, and/or restore the real and personal property to its original condition.

1460. The market value of the Trust's property has been significantly reduced.

1461. The Trust's economic losses are currently estimated as set forth in Exhibit A.

Divine Restorations Investment Trust - Marisa Aieta, trustee.

1462. At the time of the Holiday Farm Fire, the Divine Restorations Investment Trust ("Divine Restorations") owned developable real property with marketable timber and other beneficial foliage located near McKenzie Highway milepost 46.3 and within the Holiday Farm Fire Area.

1463. The real property was platted to allow development into multiple residential lots.

1464. The Holiday Farm Fire destroyed Divine Restorations' real and personal property, including a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Divine Restorations has been denied use of the described real and personal property since the time of the Fire, and it has incurred costs to inspect, clean, repair, replant, and/or restore the property to its original condition.

1465. The market value of the property, including its value for use or sale as developable lots has been significantly reduced.

1466. Divine Restorations' economic losses are currently estimated as set forth in Exhibit A.

Firestone Family Trust - Merrick Firestone, trustee

1467. At the time of the Holiday Farm Fire, the Firestone Family Trust owned real and personal property located at 91261 Blue River Road, Blue River, Oregon and within the Holiday Farm Fire Area.

1468. The Holiday Farm Fire damaged or destroyed the Trust's real and personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. The Trust has been denied use of the described real and personal property at various times since the Fire, and has incurred costs to inspect, clean, repair, replant, and/or restore its real and personal property to its original condition.

1469. The market value of the property has been significantly reduced.

1470. The Trust's economic losses are currently estimated as set forth in Exhibit A.

Godfrey Living Trust - Michael Godfrey, trustee

1471. At the time of the Holiday Farm Fire, the Godfrey Living Trust owned real and personal property located at 52435 McKenzie Highway, Blue River, Oregon, 97413 and within the Holiday Farm Fire Area.

1472. The Holiday Farm Fire destroyed the Trust's real and personal property, including 2.5 acres of trees, a 2012 Toyota Avalon, landscaping, decorative trees, and other beneficial foliage.

1473. The Trust has been denied use of its real and personal property since the time of the Fire and has incurred costs to inspect, clean, repair, replant, and/or restore its real and personal property to its original condition.

1474. The market value of the property has been significantly reduced.

1475. The Trust's economic losses are currently estimated as set forth in Exhibit A.

Helen A. Hutchinson Living Trust - Helen A. Hutchinson, trustee

1476. At the time of the Holiday Farm Fire, the Helen A. Hutchinson Living Trust ("Hutchinson Trust") owned real and personal property located at 47015 Goodpasture Road, Vida, Oregon, and within the Holiday Farm Fire Area.

1477. The Holiday Farm Fire destroyed the Hutchinson Trust's property, including a house and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. The Hutchinson Trust has been denied use of its real and personal property since the time of the Fire and has incurred costs to inspect, clean, repair, replant, and/or restore its real and personal property to its original condition.

1478. The market value of the property has been significantly reduced.

1479. The Hutchinson Trust's economic losses are currently estimated as set forth in Exhibit A.

Maddock and Acheson Family Trust - Thomas Maddock, trustee

1480. At the time of the Holiday Farm Fire, the Maddock and Acheson Family Trust owned real and personal property located at 45542 Good Pasture Road, Vida, Oregon 97488 and within the Holiday Farm Fire Area.

1481. The Holiday Farm Fire destroyed the Trust's real and personal property, including but not limited to a workshop building, woodshed, garden shed / greenhouse, tractor and implements, tools, drift boat, antique skis, roto tiller, Kubota tractor with implements, four acres of Douglas fir timber and trees, landscaping, decorative trees, and other beneficial foliage. The Trust has been denied use of its real and personal property since the time of the Fire and has incurred costs to inspect, clean, repair, replant, and/or restore its real and personal property to its original condition.

1482. The market value of its property has been significantly reduced.

1483. The Trust's economic losses are currently estimated as set forth in Exhibit A.

McWilliams Living Trust - Andy and Elizabeth McWilliams, trustees

1484. At the time of the Holiday Farm Fire, the McWilliams Living Trust owned real and personal property located at 47227 Goodpasture Road, Vida, Oregon, and within the Holiday Farm Fire

Area.

1485. The Holiday Farm Fire destroyed the Trust's real and personal property. The Trust has been denied use of the described real and personal property since the time of the Fire.

1486. The market value of the property has been significantly reduced.

1487. The Trust's economic losses are currently estimated as set forth in Exhibit A.

Melvin A. Morrow Revocable Living Trust - Scott Morrow, trustee

1488. At the time of the Holiday Farm Fire, the Melvin A. Morrow Revocable Living Trust owned real and personal property located at 47983, 47975, and 47987 McKenzie Highway, Vida, Oregon 97488 and within the Holiday Farm Fire Area.

1489. The Holiday Farm Fire destroyed the Trust's real and personal property, including but not limited to several homes, all contents, and appurtenances, over 34 acres of merchantable timber, landscaping, decorative trees, and other beneficial foliage. The Trust has lost rental income and been denied use of its real and personal property since the time of the Fire and has incurred costs to inspect, clean, repair, replant, and/or restore its real and personal property to its original condition.

1490. The market value of its property has been significantly reduced.

1491. The Trust's economic losses are currently estimated to total the figure set forth in Exhibit A.

Marion O'Leary Living Trust - Marion O'Leary, trustee

1492. At the time of the Holiday Farm Fire, the Marion O'Leary Living Trust ("O'Leary Trust") owned real and personal property located at 46064 Gate Creek Road, Vida, Oregon, and within the Holiday Farm Fire Area.

1493. The Holiday Farm Fire destroyed the O'Leary Trust's property, including a home, other

structures, personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. The Trust has been denied use of the described real and personal property since the time of the Fire and has incurred costs to inspect, clean, repair, replant, and/or restore its real and personal property to its original condition.

1494. The market value of its property has been significantly reduced.

1495. The O’Leary Trust’s economic losses are currently estimated as set forth in Exhibit A.

Polamero Family Trust - Perry and Daryl Lynn Polamero, trustees

1496. At the time of the Holiday Farm Fire, the Polamero Family Trust owned real and personal property located at 90236 Cascade View Drive, Vida, Oregon, and within the Holiday Farm Fire Area.

1497. The Holiday Farm Fire destroyed the Trust’s property, including a home, other structures, personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. The Trust has been denied use of the described real and personal property since the time of the Fire and has incurred costs to inspect, clean, repair, replant, and/or restore its real and personal property to its original condition.

1498. The market value of its property has been significantly reduced.

1499. The Trust’s economic losses are currently estimated as set forth in Exhibit A.

Rose Joint Trust - Judith Rose, trustee

1500. At the time of the Holiday Farm Fire, the Rose Joint Trust owned real and personal property located at 90485 Mountain View Lane, Leaburg, Oregon and within the Holiday Farm Fire Area.

1501. The Holiday Farm Fire destroyed the Trust’s real and personal property, including a residence, appurtenances, timber, landscaping, decorative trees, and other beneficial foliage. The Trust

has been denied use of its real and personal property since the time of the Fire and has incurred costs to inspect, clean, repair, replant, and/or restore its real and personal property to its original condition.

1502. The market value of the property has been significantly reduced.

1503. The Trust's economic losses are currently estimated as set forth in Exhibit A.

Sangermano Family Trust - Lou and Frances Sangermano, trustees

1504. At the time of the Holiday Farm Fire, the Sangermano Family Trust owned real and personal property located at 49798 McKenzie Highway, Vida, Oregon and within the Holiday Farm Fire Area.

1505. The Holiday Farm Fire destroyed the Trust's real and personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. The Trust has been denied use of the described real and personal property since the time of the Fire, and has incurred costs to inspect, clean, repair, replant, and/or restore its real and personal property to its original condition.

1506. The market value of its property has been significantly reduced.

1507. The Trust's economic losses are currently estimated as set forth in Exhibit A.

Patricia K. Spady Trust - Patricia Spady, trustee

1508. At the time of the Holiday Farm Fire, the Patricia K. Spady Trust owned personal property located at 51503 Blue River Drive, Vida, Oregon 97488; 91326 Eck & Pierce Drive, Vida, Oregon 97488; 51190 Blue River Drive, Vida, Oregon 97488; 49536 McKenzie Highway, Vida, Oregon 97488 and within the Holiday Farm Fire Area.

1509. The Holiday Farm Fire destroyed the Trust's personal property, including but not limited to personal items, structures, appurtenances, outbuildings, timber, landscaping, decorative trees, and other beneficial foliage. The Trust has been denied use of its personal property since the time of the Fire

and has incurred costs to inspect, clean, repair, replant, and/or restore its personal property to its original condition.

1510. The market value of its personal property has been significantly reduced.

1511. The Trust's economic losses are currently estimated as set forth in Exhibit A.

The Eleanor Stuck Trust - Deborah Davenport, trustee

1512. At the time of the Holiday Farm Fire, the Eleanor Stuck Trust owned real and personal property located at 54645 McKenzie River Drive, Blue River, Oregon 97413 and within the Holiday Farm Fire Area.

1513. The Holiday Farm Fire destroyed the Trust's real and personal property, including but not limited to two homes, one shop, a manufactured home, tools, four acres of trees, shrubbery, landscaping, and other beneficial foliage. The Trust has been denied use of its real and personal property since the time of the Fire and has incurred costs to inspect, clean, repair, replant, and/or restore its real and personal property to its original condition.

1514. The market value of its property has been significantly reduced.

1515. The Trust's economic losses are currently estimated as set forth in Exhibit A.

T & K Anderson Trust - Karen Anderson, trustee

1516. At the time of the Holiday Farm Fire, the T & K Anderson Trust owned real and personal property located at 51290 McKenzie Highway, Vida, Oregon, and within the Holiday Farm Fire Area.

1517. The Trust's property destroyed in the Fire included a home, shop, three-car garage, a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. The Trust has been denied use of the described real and personal property since the time of the Fire and has incurred costs to inspect, clean, repair, replant, and/or restore the property to its original condition.

1518. The market value of its property has been significantly reduced.

1519. The T & K Anderson Trust's economic losses are currently estimated as set forth in Exhibit A.

Taylor Family Trust - Merlin Call, trustee

1520. At the time of the Holiday Farm Fire, the Taylor Family Trust owned real and personal property located at 47664 McKenzie Highway, Vida, Oregon 97488 and within the Holiday Farm Fire Area.

1521. The Trust's property destroyed in the Fire included real and personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. The Trust has been denied use of the described real and personal property since the time of the Fire, and has incurred costs to inspect, clean, repair, replant, and/or restore his real and personal property to its original condition.

1522. The market value of the Trust's property has been significantly reduced.

1523. The Trust's economic losses are currently estimated as set forth in Exhibit A.

Thompson Family Trust - Joan Thompson, trustee

1524. At the time of the Holiday Farm Fire, the Thompson Family Trust owned real and personal property located at 47011 Goodpasture Road, Vida, Oregon, and within the Holiday Farm Fire Area.

1525. The Trust's property destroyed in the Fire included real and personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. The Trust has been denied use of the described real and personal property since the time of the Fire, and has incurred costs to inspect, clean, repair, replant, and/or restore his real and personal property to its original

condition.

1526. The market value of the Trust's property has been significantly reduced.

1527. The Thompson Family Trust's economic losses are currently estimated as set forth in Exhibit A.

Zietz Living Trust - Carl Zietz, trustee

1528. At the time of the Holiday Farm Fire, the Zietz Living Trust owned real and personal property located at 91260 Blue River Road, Blue River, Oregon, and within the Holiday Farm Fire Area.

1529. The Holiday Farm Fire destroyed the Trust's property, including a residence and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. The Trust has been denied use of its real and personal property since the time of the Fire and has incurred costs to inspect, clean, repair, replant, and/or restore its real and personal property to its original condition.

1530. The market value of the property has been significantly reduced.

1531. The Trust's economic losses are currently estimated as set forth in Exhibit A.

Bates Catering, Inc.

1532. At the time of the Holiday Farm Fire, Bates Catering, Inc. ("Bates Catering") was an Oregon corporation owned and operated by Sandra Bates and Alan Bates, Jr. as a catering and wedding services business on their property located at 54455 McKenzie River Drive, Blue River, Oregon, and within the Holiday Farm Fire Area.

1533. As a direct result of the Holiday Farm Fire, personal property belonging to Bates Catering was damaged or destroyed and it has lost a substantial amount of business, bookings, and income and will continue to incur losses in the future.

1534. The market value of the business and its property has been significantly reduced.

1535. Bates Catering's past and future economic losses are currently estimated as set forth in Exhibit A.

Bash Residential, LLC

1536. At the time of the Holiday Farm Fire, Bash Residential, LLC ("Bash Residential") owned real property located near McKenzie Highway milepost 46.5, and within the Fire Area.

1537. The Holiday Farm Fire destroyed Bash Residential's real and personal property, including a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Bash Residential has been denied use of its real and personal property since the time of the Fire and has incurred costs to inspect, clean, repair, replant, and/or restore its real and personal property to its original condition.

1538. The market value of the business and its property has been significantly reduced.

1539. Bash Residential's economic losses are currently estimated as set forth in Exhibit A.

Earth Quest Partners, LLC

1540. At the time of the Holiday Farm Fire, Earth Quest Partners, LLC ("EQP") operated the McKenzie River Mountain Resort and owned real and personal property located at 51668 Blue River Drive, Blue River, Oregon, 97413 and within the Holiday Farm Fire Area.

1541. The Holiday Farm Fire destroyed the EQP's real and personal property, including but not limited to a resort business that operated with eight buildings, and damaged or destroyed approximately 50 trees, landscaping, and other beneficial foliage. EQP has been denied use of its real and personal property since the time of the Fire and has incurred costs to inspect, clean, repair, replant, and/or restore its real and personal property to its original condition.

1542. The market value of the business and its property has been significantly reduced.

1543. EQP lost a substantial amount of rental and resort income because of the Fire.

1544. EQP'S economic losses are currently estimated as set forth in Exhibit A.

Earthscapes of Oregon, LLC

1545. At the time of the Holiday Farm Fire, Earthscapes of Oregon, LLC ("Earthscapes") owned real and personal property located at 49536 McKenzie Highway, 51190 Blue River Drive, 91326 Eck Pierce Drive, and 51503 Blue River Drive, Vida, Oregon, and within the Holiday Farm Fire Area.

1546. The damages to each of the properties at issue include but are not limited to the following:

- a. 49536 McKenzie Highway – storage building with attached garage and water storage unit completely burned and destroyed by the Fire, 15-acre reforestation parcel burned and destroyed by the Fire;
- b. 51190 Blue River Drive – two storage buildings burned and destroyed by the Fire, severe and extensive fire damage to main house on the property;
- c. 91326 Eck Pierce Drive – main house, attached garage, carport, garbage storage area, large supply storage depot, attached woodshed full of wood, and carport on the side of chicken barn completely burned and destroyed by the Fire;
- d. 51503 Blue River Drive – main three-story farmhouse, barn, woodshed full of firewood completely burned and destroyed by fire, detached studio with carport damaged by fire and smoke.

1547. The Holiday Farm Fire destroyed or damaged Earthscapes' real and personal property, including but not limited homes, buildings, structures, timber, landscaping, decorative trees, and other

beneficial foliage. Earthscapes has been denied use of its real and personal property and has lost rental and business income because of the damages and losses since the time of the Fire, and has incurred costs to inspect, clean, repair, replant, and/or restore its real and personal property to its original condition.

1548. Earthscapes had incurred significant costs and expenses for its hourly employees to submit claims to its insurers in order to receive partial recovery for its losses.

1549. The market value of the business and its property has been significantly reduced.

1550. Earthscapes' economic losses are currently estimated as set forth in Exhibit A.

Emsea Creative, LLC

1551. At the time of the Holiday Farm Fire, Emsea Creative, LLC ("EC") was a business that owned personal and business property located at 51290 McKenzie Highway, Vida, Oregon 97488 and within the Holiday Farm Fire Area.

1552. The Holiday Farm Fire destroyed EC's personal and business property, including but not limited to valuable rare and vintage photographs. The EC has been denied use of its real and personal property since the time of the Fire and has incurred costs to inspect, clean, repair, replant, and/or restore its real and personal property to its original condition.

1553. The market value of the business and its property has been significantly reduced.

1554. EC's economic losses are currently estimated as set forth in Exhibit A.

Finn Rock Timber, LLC

1555. At the time of the Holiday Farm Fire, Finn Rock Timber, LLC ("Finn Rock") owned 132.49 acres of harvestable timberland within the Holiday Farm Fire Area.

1556. All 132.49 acres of timber on the Finn Rock's property were burned and/or destroyed by

the Holiday Farm Fire.

1557. To mitigate its damages, Finn Rock logged the burned timber from its property and sold the salvage timber in a commercially reasonable sale.

1558. The damage caused by the Holiday Farm Fire also required inspection, clean-up, and other services necessary to remove and dispose of unmarketable burned timber remaining on the site and required replanting trees on the property.

1559. The market value of the business and its property has been significantly reduced.

1560. Finn Rock's economic losses currently estimated as set forth in Exhibit A.

Illahe Properties, LLC

1561. At the time of the Holiday Farm Fire, Illahe Properties LLC ("Illahe Properties") owned real and personal property located at 46725 & 46727 Goodpasture Road, Vida, Oregon and within the Holiday Farm Fire Area.

1562. The Holiday Farm Fire damaged or destroyed Illahe Properties' real and personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage. Illahe Properties has been denied use of the described real and personal property at various times since the Fire, and has incurred costs to inspect, clean, repair, replant, and/or restore its real and personal property to its original condition.

1563. The market value of the business and its property has been significantly reduced.

1564. Illahe Properties' economic losses are currently estimated as set forth in Exhibit A.

Iron Forest Oregon, LLC

1565. At the time of the Holiday Farm Fire, Iron Forest, LLC ("Iron Forest") was an Oregon corporation owned and operated by Janice and Arthur Myers on their property located at 49687

McKenzie Highway, Vida, Oregon, and within the Holiday Farm Fire Area.

1566. As a direct result of the Holiday Farm Fire, personal property belonging to Iron Forest was damaged or destroyed and it has lost a substantial amount of business, bookings, and income and will continue to incur losses in the future.

1567. The market value of the business and its property has been significantly reduced.

1568. Iron Forest's past and future economic losses are currently estimated as set forth in Exhibit A.

M&M Land and Cattle Co., LLC

1569. At the time of the Holiday Farm Fire, M&M Land and Cattle Co, LLC ("M&M") owned real and personal property located at 52508 and 52511 McKenzie Highway, Blue River, Oregon, and within the Holiday Farm Fire Area.

1570. The Holiday Farm Fire destroyed M&M's real and personal property, including a home, structures, timber, landscaping, decorative trees, and other beneficial foliage. M&M has been denied use of its real and personal property since the time of the Fire and has incurred costs to inspect, clean, repair, replant, and/or restore its real and personal property to its original condition.

1571. The market value of the business, its property, and rental income has been significantly reduced.

1572. M&M's economic losses are currently estimated as set forth in Exhibit A.

McKenzie Mist, and assumed business name of M&M H2O, Inc.

1573. At the time of the Holiday Farm Fire, McKenzie Mist was an assumed business name of M&M H2O, Inc.

1574. McKenzie Mist was an ongoing for-profit business located at 50907 McKenzie Highway,

Blue River, Oregon 97413 and within the Holiday Farm Fire Area.

1575. The Holiday Farm Fire destroyed all of McKenzie Mist's business and personal property, including but not limited to computers, bottling lines for bottling water, water tanks, and an Isuzu 24' box truck. McKenzie Mist has been denied use of its property and has been unable to conduct business since the time of the Fire.

1576. McKenzie Mist has incurred lost business, loss of business property, and lost income, and will incur costs to replace its business property and restart its business.

1577. The market value of the business and its property has been significantly reduced.

1578. McKenzie Mist's economic losses are currently estimated as set forth in Exhibit A.

Nugent Holdings, LLC

1579. At the time of the Holiday Farm Fire, Nugent Holdings, LLC ("Nugent Holdings") managed real property, and owned personal property located at 48520 McKenzie Highway, Vida, Oregon, and within the Holiday Farm Fire Area.

1580. The Holiday Farm Fire destroyed real property managed by Nugent Holdings and destroyed its personal property. Nugent Holdings has been denied income from management of the real property and use of its personal property since the time of the Fire.

1581. The market value of the business and its property has been significantly reduced.

1582. Nugent Holdings' economic losses are currently estimated as set forth in Exhibit A.

Oregon Mountain Adventures, LLC

1583. At the time of the Holiday Farm Fire, the Oregon Mountain Adventures, LLC ("OMA") was doing business as McKenzie Audio and owned real and personal property located at 51668 Blue River Drive, Blue River, Oregon 97413 and within the Holiday Farm Fire Area.

1584. The Holiday Farm Fire destroyed OMA's real and personal property, including but not limited to 165 chairs, 70 tables, 2- 20x40 outdoor tents, 7 other outdoor tents, stereo and DJ equipment, live sound equipment, cables, lighting and truss equipment, a trailer, projectors, screens, and video equipment. OMA has been denied use of its real and personal property since the time of the Fire and has incurred costs to inspect, clean, repair, replant, and/or restore its real and personal property to its original condition. OMA has also lost income because of the Fire.

1585. The market value of the business and its property has been significantly reduced.

1586. OMA's economic losses are currently estimated as set forth in Exhibit A.

Plaid Hedgehog, LLC

1587. At the time of the Holiday Farm Fire, Plaid Hedgehog, LLC ("PH") was a business that owned real and personal property located at 45861 McKenzie Highway, Vida, Oregon 97488 and within the Holiday Farm Fire Area.

1588. The Holiday Farm Fire destroyed PH's real and personal property, including but not limited to a house, appurtenances, timber, landscaping, decorative trees, and other beneficial foliage. PH has been denied use of its real and personal property since the time of the Fire and has incurred costs to inspect, clean, repair, replant, and/or restore its real and personal property to its original condition.

1589. PH lost rental income because of the Fire.

1590. The market value of the business and its property has been significantly reduced.

1591. PH's economic losses are currently estimated as set forth in Exhibit A.

Sequoia Environmental Services, LLC

1592. At the time of the Holiday Farm Fire, Sequoia Environmental Services, LLC ("SES")

was a business that owned real and personal property located at 51668 Blue River Drive, Blue River, Oregon 97413 and within the Holiday Farm Fire Area.

1593. The Holiday Farm Fire destroyed SES's real and personal property, including but not limited to a Ford F550 truck, dump trailer, commercial lawnmowers, brush cutters, commercial blower, pressure washer, hand tools, PPE equipment, and a Panasonic Textbook – CS31. SES has been denied use of its real and personal property since the time of the Fire and has incurred costs to inspect, clean, repair, and/or restore its real and personal property to its original condition.

1594. SES lost business and income because of the Fire.

1595. The market value of the business and its property has been significantly reduced.

1596. SES's economic losses are currently estimated as set forth in Exhibit A.

Taylor Brothers Timber, LLC

1597. At the time of the Holiday Farm Fire, Taylor Brothers Timber, LLC ("Taylor Timber") owned 239.91 acres of timberland described as Lane County Tax Map 16453000, Lot 300 and alternatively as Section 25 30 Township 16S Range 3 4, Blue River, Oregon 97413 ("Fern Creek Tree Farm").

1598. All 231.91 acres of marketable timber on Fern Creek Tree Farm were burned and destroyed by the Holiday Farm Fire.

1599. As of August 2020, the timber on Fern Creek Tree Farm had a net present value of \$1,337,255.

1600. On or about October 27, 2020, to mitigate its damages, Taylor Timber sold the Fern Creek Tree Farm, including all burned timber and the underlying land, to a third party in a commercially reasonable sale for \$200,000.

1601. The purchase price represented a value of \$157,690 for the land and \$42,310 as salvage value for the timber.

1602. The market value of the business and the value of the real property and timber at Taylor Timber's Fern Creek Tree Farm was reduced by \$1,294,945.

1603. Taylor Timber's economic losses are currently estimated as set forth in Exhibit A.

The Oregon Cliff House, LLC

1604. At the time of the Holiday Farm Fire, The Oregon Cliff House, LLC ("Cliff House") was a limited liability corporation involved in the management and leasing of real and personal vacation property owned by Shaun Nugent, located at 48520 McKenzie Highway, Vida, Oregon, and within the Holiday Farm Fire Area.

1605. The Holiday Farm Fire substantially destroyed the real and personal property managed and leased by Cliff House, causing it to lose income from the time of the Fire until the present.

1606. The market value of the business and its property has been significantly reduced.

1607. The Cliff House's economic losses are currently estimated as set forth in Exhibit A.

Whispering Pines Oregon, LLC

1608. At the time of the Holiday Farm Fire, Whispering Pines Oregon LLC ("Whispering Pines") owned real and personal property located at 46747 Goodpasture Road, Vida, Oregon and within the Holiday Farm Fire Area.

1609. The Holiday Farm Fire destroyed Whispering Pines' real and personal property, and a significant amount of timber, landscaping, decorative trees, and other beneficial foliage.

1610. Whispering Pines has been denied use of the described real and personal property since the time of the Fire, has lost significant business and rental income, and has incurred costs to inspect,

clean, repair, replant, and/or restore its real and personal property to its original condition.

1611. The market value of the business and its property has been significantly reduced.

1612. Whispering Pines has lost rental and other business income because of the Fire.

1613. Whispering Pines' economic losses are currently estimated as set forth in Exhibit A.

Wild Mountain, LLC

1614. At the time of the Holiday Farm Fire, Wild Mountain, LLC ("Wild Mountain") owned real and personal business property located at 54655 McKenzie River Drive, D5, Blue River, Oregon, 97413 and within the Holiday Farm Fire Area.

1615. The Holiday Farm Fire destroyed Wild Mountain's real and personal business property. Wild Mountain has been denied use of the described real and personal property since the time of the Fire, and has incurred costs to inspect, clean, repair, replant, and/or restore its real and personal property to its original condition.

1616. Wild Mountain also lost significant business income because of the Holiday Farm Fire.

1617. The market value of the business and its property has been significantly reduced.

1618. Wild Mountain's economic losses are currently estimated as set forth in Exhibit A.

Jennifer Campbell as *guardian ad litem* for Caleb Campbell, a minor

1619. At the time of the Holiday Farm Fire, Jennifer Campbell was the parent and guardian of Caleb Campbell, a minor. Caleb lived with Jennifer Campbell at 46055 McKenzie Highway, Vida, Oregon 97488 and within the Holiday Farm Fire Area.

1620. Concurrent with the filing of this complaint, Jennifer Campbell has filed a petition with this court to be appointed as the legal guardian ad litem for Caleb Campbell.

1621. Caleb inhaled smoke and ash, causing respiratory distress, sore throat, and headaches.

1622. He has also been displaced and required to move to an alternative residence because of the Fire. Campbell has incurred costs and expenses necessary to secure and maintain alternative housing.

1623. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

1624. Caleb Campbell's non-economic losses are currently estimated to not exceed the figure set forth in Exhibit A.

Kurt Conner as *guardian ad litem* for Jack Conner, a minor

1625. At the time of the Holiday Farm Fire, Kurt Conner was the parent and guardian of Jack Conner, a minor. Jack Conner lived with Kurt Conner at 47555 McKenzie Highway, Vida, Oregon and within the Holiday Farm Fire Area.

1626. Concurrent with the filing of this complaint, Conner has filed a petition with this court to be appointed as the legal guardian ad litem for Jack Conner.

1627. Jack Conner inhaled smoke and ash, causing respiratory distress, sore throat, headaches, wheezing, chemical conjunctivitis, oropharyngitis, and rhinorrhea.

1628. He has also been displaced and required to move to an alternative residence because of the Fire. Conner has incurred costs and expenses necessary to secure and maintain alternative housing.

1629. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

1630. Jack Conner's non-economic losses are currently estimated to not exceed the figure set forth in Exhibit A.

Kurt Conner as *guardian ad litem* for Joseph Conner, a minor

1631. At the time of the Holiday Farm Fire, Kurt Conner was the parent and guardian of Joseph Conner, a minor. Joseph Conner lived with Kurt Conner at 47555 McKenzie Highway, Vida, Oregon and within the Holiday Farm Fire Area.

1632. Concurrent with the filing of this complaint, Conner has filed a petition with this court to be appointed as the legal guardian ad litem for Joseph Conner.

1633. Joseph Conner inhaled smoke and ash, causing respiratory distress, sore throat, headaches, wheezing, chemical conjunctivitis, oropharyngitis, and rhinorrhea.

1634. He has also been displaced and required to move to an alternative residence because of the Fire. Conner has incurred costs and expenses necessary to secure and maintain alternative housing.

1635. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

1636. Conner's non-economic losses are currently estimated to not exceed the figure set forth in Exhibit A.

Kurt Conner as *guardian ad litem* for Juniper Conner, a minor

1637. At the time of the Holiday Farm Fire, Kurt Conner was the parent and guardian of Juniper Conner, a minor. Juniper Conner lived with Kurt Conner at 47555 McKenzie Highway, Vida, Oregon and within the Holiday Farm Fire Area.

1638. Concurrent with the filing of this complaint, Conner has filed a petition with this court to be appointed as the legal guardian ad litem for Juniper Conner.

1639. Juniper Conner inhaled smoke and ash, causing respiratory distress, sore throat, headaches, wheezing, chemical conjunctivitis, oropharyngitis, and rhinorrhea.

1640. She has also been displaced and required to move to an alternative residence because of

the Fire. Conner has incurred costs and expenses necessary to secure and maintain alternative housing.

1641. She has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

1642. Juniper Conner's non-economic losses are currently estimated to not exceed the figure set forth in Exhibit A.

Elnara Gasanova as *guardian ad litem* for Dimitri MacDonald, a minor:

1643. At the time of the Holiday Farm Fire, Gasanova was the parent and guardian of Dimitri MacDonald, a minor. Dimitri MacDonald lived with Elnara Gasanova at 50233 McKenzie Highway, Vida, Oregon 97488 and within the Holiday Farm Fire Area.

1644. Concurrent with the filing of this complaint, Gasanova has filed a petition with this court to be appointed as the legal guardian ad litem for Dimitri MacDonald.

1645. MacDonald inhaled smoke and ash during the Fire, causing respiratory distress, sore throat, and headaches.

1646. He has also been displaced and required to move to an alternative residence because of the Fire. MacDonald has incurred costs and expenses necessary to secure and maintain alternative housing.

1647. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

1648. MacDonald's non-economic losses are currently estimated to not exceed the figure set forth in Exhibit A.

Elnara Gasanova as *guardian ad litem* for Anastasia MacDonald, a minor:

1649. At the time of the Holiday Farm Fire, Gasanova was the parent and guardian of Anastasia

MacDonald, a minor. Anastasia MacDonald lived with Elnara Gasanova at 50233 McKenzie Highway, Vida, Oregon 97488 and within the Holiday Farm Fire Area.

1650. Concurrent with the filing of this complaint, Gasanova has filed a petition with this court to be appointed as the legal guardian ad litem for Anastasia MacDonald.

1651. MacDonald inhaled smoke and ash during the Fire, causing respiratory distress, sore throat, and headaches.

1652. She has also been displaced and required to move to an alternative residence because of the Fire. MacDonald has incurred costs and expenses necessary to secure and maintain alternative housing.

1653. She has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

1654. MacDonald's non-economic losses are currently estimated to not exceed the figure set forth in Exhibit A.

Michael Kruse as *guardian ad litem* for Sequoia Bakkum-Kruse, a minor:

1655. At the time of the Holiday Farm Fire, Michael Kruse was the parent and guardian of Sequoia Bakkum-Kruse, a minor. Bakkum-Kruse lived with her parent at 51668 Blue River Drive, Blue River, Oregon 97413 and within the Holiday Farm Fire Area.

1656.

1657. Bakkum-Kruse inhaled smoke and ash from the Fire, causing respiratory distress, headaches, and upset stomach.

1658. She has also been displaced and required to move to an alternative residence because of the Fire. Bakkum-Kruse has incurred costs and expenses necessary to secure and maintain alternative

housing.

1659. She has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

1660. Bakkum-Kruse's non-economic losses are currently estimated to not exceed the figure set forth in Exhibit A.

Kaleb Simpson-Randall

1661. At the time of the Holiday Farm Fire, Kaleb Simpson-Randall lived with David Simpson at 45135 McKenzie Highway, Leaburg, Oregon 97489 and within the Holiday Farm Fire Area.

1662. Kaleb Simpson-Randall inhaled smoke and ash, causing respiratory distress, sore throat, and headaches.

1663. He has also been displaced and required to move to an alternative residence because of the Fire. Simpson-Randall has incurred costs and expenses necessary to secure and maintain alternative housing.

1664. Simpson-Randall's economic losses are currently estimated as set forth in Exhibit A.

1665. He has experienced stress, fear, inconvenience, and emotional and mental distress because of the bodily injuries, damages, and losses caused by the Holiday Farm Fire.

1666. Kaleb Simpson-Randall's non-economic losses are currently estimated to not exceed the figure set forth in Exhibit A.

FIRST CLAIM FOR RELIEF

(Negligence - BPA)

1667. Plaintiffs reallege each of the foregoing paragraphs and further allege:

1668. BPA had a non-delegable duty to use reasonable care to avoid exposing Plaintiffs

and their real and personal property to a foreseeable risk of harm from operation of its BPA Powerlines.

1669. BPA was negligent and created a foreseeable risk of harm to Plaintiffs and their property in one or more of the following ways when it:

- a. failed to properly or timely inspect the portion of its Cougar-Holden 115kV Line and surroundings located in the Holiday Farm Fire Area;
- b. failed to ensure trees would not fall onto or contact the portion of its Cougar-Holden Creek 115kV transmission line located in the Holiday Farm Fire Area during a high wind and Red Flag event;
- c. failed to design, construct, monitor, or maintain the portion of its Cougar-Holden 115kV Line located in the Holiday Farm Fire Area in a manner that avoided igniting fires;
- d. failed to de-energize the portion of its Cougar-Holden 115kV Line located in the Holiday Farm Fire Area during the high wind and Red Flag event on September 7, 2020;
- e. failed to institute a Public Safety Power Shutoff (“PSPS”) for the portion of its Cougar-Holden 115kV Line located in the Holiday Farm Fire Area during the high wind and Red Flag event on September 7, 2020;
- f. failed to de-energize the portion of its BPA Powerlines that provided electrical power to EWEB’s and LEC’s Powerlines within the area of the Holiday Farm Fire Area during the high wind and Red Flag event on September 7, 2020;
- g. failed to institute a Public Safety Power Shutoff (“PSPS”) for the portion of its Cougar-Holden 115kV transmission line located in the Holiday Farm Fire Area during the high wind and Red Flag event on September 7, 2020;
- h. failed to comply with its own internal vegetation management rules and standards for removal of Danger Trees that could fall into BPA’s transmission

lines.

1670. As a direct and foreseeable result of BPA's negligent acts and omissions, Plaintiffs suffered the injuries and damages set forth in this Complaint and Exhibit A.

SECOND CLAIM FOR RELIEF

(Negligence - EWEB)

1671. Plaintiffs reallege each of the foregoing paragraphs and further allege:

1672. EWEB had a non-delegable duty to use reasonable care to avoid exposing Plaintiffs and their real and personal property to foreseeable risk of harm from operation of its EWEB Powerlines.

1673. EWEB was negligent and created a foreseeable risk of harm to Plaintiffs and their property in one or more of the following ways when it:

- a. failed to properly or timely inspect its EWEB Powerlines and surroundings located in the Holiday Farm Fire Area;
- b. failed to properly or timely inspect for and remove Danger Trees adjacent to its EWEB 115kV Line near its crossing over the LEC 34.5 kV Line near highway milepost 47 in the Holiday Farm Fire Area;
- c. failed to take reasonable and necessary steps to ensure that during a high wind and Red Flag event, Danger Trees would not fall into or contact its EWEB 115 kV Line near highway milepost 47 in the Holiday Farm Fire Area;
- d. failed to otherwise inspect and maintain its EWEB Powerline at and near where it crossed over the LEC 34.5 kV line near highway milepost 47 in the Holiday Farm Fire Area in a manner that avoided igniting fires.
- e. failed to set circuit breakers PCB No. 7170 and No. 7180 at its Holden Creek Substation to the "lockout" mode during the afternoon and evening of September 7, 2020;
- f. failed to have qualified personnel reasonably available to field calls or other

contact from emergency responders and firefighters during the afternoon and evening of September 7, 2020;

- g. failed to timely respond to requests for information from emergency responders and firefighters on September 7, 2020.

1674. As a direct and foreseeable result of EWEB's negligent acts and omissions, Plaintiffs suffered the injuries and damages set forth in this Complaint and Exhibit A.

THIRD CLAIM FOR RELIEF

(Negligence - LEC)

1675. Plaintiffs reallege each of the foregoing paragraphs and further allege:

1676. LEC had a non-delegable duty to use reasonable care to avoid exposing Plaintiffs and their real and personal property to foreseeable risk of harm from operation of its LEC Powerlines.

1677. LEC was negligent and created a foreseeable risk of harm to Plaintiffs and their property in one or more of the following ways when it:

- a. failed to properly or timely inspect its LEC Powerlines and surroundings located in the Holiday Farm Fire Area;
- b. failed to properly or timely inspect for and remove Danger Trees adjacent to its LEC 34.5 kV Line near its crossing under the EWEB 115kV Line near highway milepost 47 in the Holiday Farm Fire Area;
- c. failed to take reasonable and necessary steps to ensure that during a high wind and Red Flag event, Danger Trees would not fall into or contact its LEC Powerline or the overhead EWEB 115 kV line near highway milepost 47 in the Holiday Farm Fire Area;
- d. failed to otherwise inspect and maintain its LEC Powerline at and near where it crossed under the EWEB 115kV line near highway milepost 47 in the Holiday Farm Fire Area in a manner that avoided igniting fires.

- e. failed to set its circuit breakers on its LEC 34.5 kV Line to the “lockout” mode during the afternoon and evening of September 7, 2020;
- f. failed to de-energize the portion of its LEC Powerlines located in the Holiday Farm Fire Area during the high wind and Red Flag event on September 7, 2020.
- g. failed to institute a Public Safety Power Shutoff (“PSPS”) for the portion of its LEC Powerlines located in the Holiday Farm Fire Area during the high wind and Red Flag event on September 7, 2020.

1678. As a direct and foreseeable result of LEC’s negligent acts and omissions, Plaintiffs suffered the injuries and damages set forth in this Complaint and Exhibit A.

FOURTH CAUSE OF ACTION

(Negligence *per se* - EWEB)

1679. Plaintiffs incorporate and reallege each of the foregoing paragraphs as though fully set forth herein.

1680. Oregon has adopted the National Electrical Safety Code (“NESC”), 1977 as safety rules and regulations applicable to the construction, operation, and maintenance of electrical distribution and transmission systems within Oregon, including EWEB’s Electrical Systems. See, ORS 757.035(2) and (3); OAR 860-024-0001(1); OAR 860-024-0010; OAR 860-024-0011.

1681. The NESC, Part 2 -*Vegetation Management*, Section 20, Para. 218 (B) requires:

At line crossings *** the crossing span and the adjoining span on each side of the crossing should be kept free from overhanging or decayed trees or limbs that otherwise might fall into the line.

1682. Oregon’s Administrative Rules also set legal standards related to the vegetation management of EWEB’s Powerlines. These include OAR 860-024-0016:

In determining the extent of trimming required to maintain the clearances required in section (5) of this rule, the operator of electric supply facilities must consider at minimum the following factors for each conductor:

(e) Growth habit, strength, and health of vegetation growing adjacent to the conductor, with the combined displacement of the vegetation, supporting structures, and conductors under adverse weather or routine wind conditions.

1683. The Vegetation Management provisions of the NESC and the Oregon Administrative Rules were intended, in significant part, to prevent trees and vegetation from falling into power lines resulting in electrical arcing or “flash-over,” and to prevent line breaks or failure causing energized lines to contact vegetation below, both of which are known sources of wildfire ignition.

1684. As owners of real and personal property and/or residents within the Holiday Farm Fire area, Plaintiffs were within the class of persons these Vegetation Management provisions were intended to protect.

1685. EWEB failed and neglected to comply with the Vegetation Management requirements of the NESC and the Oregon Administrative Rules when it:

- a. failed to properly or timely inspect its EWEB Powerlines and surroundings located in the Holiday Farm Fire Area;
- b. failed to properly or timely inspect for and remove Danger Trees adjacent to its EWEB 115kV Line near its crossing over the LEC 34.5 kV Line near highway milepost 47 in the Holiday Farm Fire Area;
- c. failed to take reasonable and necessary steps to ensure that during a high wind and Red Flag event, Danger Trees would not fall into or contact its EWEB 115 kV Line near highway milepost 47 in the Holiday Farm Fire Area;
- d. failed to otherwise inspect and maintain its EWEB Powerline at and near where it crossed over the LEC 34.5 kV line near highway milepost 47 in the Holiday Farm Fire Area in a manner that avoided igniting fires.

1686. EWEB’s violation of the Vegetation Management requirements of NESC and the

Oregon Administrative Rules was negligent as a matter of law.

1687. As a direct and foreseeable result of EWEB's negligent acts and omissions, Plaintiffs suffered the injuries and damages set forth in this Complaint and Exhibit A.

FIFTH CAUSE OF ACTION

(Negligence *per se* - LEC)

1688. Plaintiffs incorporate and reallege each of the foregoing paragraphs as though fully set forth herein.

1689. Oregon has adopted the National Electrical Safety Code ("NESC"), 1977 as safety rules and regulations applicable to the construction, operation, and maintenance of electrical distribution and transmission systems within Oregon, including EWEB's Electrical Systems. See, ORS 757.035(2) and (3); OAR 860-024-0001(1); OAR 860-024-0010; OAR 860-024-0011.

1690. The NESC, Part 2 -*Vegetation Management*, Section 20, Para. 218 (B) requires:

At line crossings *** the crossing span and the adjoining span on each side of the crossing should be kept free from overhanging or decayed trees or limbs that otherwise might fall into the line.

1691. Oregon's Administrative Rules also set legal standards related to the vegetation management of EWEB's Powerlines. These include OAR 860-024-0016:

In determining the extent of trimming required to maintain the clearances required in section (5) of this rule, the operator of electric supply facilities must consider at minimum the following factors for each conductor:

(e) Growth habit, strength, and health of vegetation growing adjacent to the conductor, with the combined displacement of the vegetation, supporting structures, and conductors under adverse weather or routine wind conditions.

1692. The Vegetation Management provisions of the NESC and the Oregon Administrative Rules were intended, in significant part, to prevent trees and vegetation from falling into power lines resulting in electrical arcing or "flash-over," and to prevent line breaks or

failure causing energized lines to contact vegetation below, both of which are known sources of wildfire ignition.

1693. As owners of real and personal property and/or residents within the Holiday Farm Fire area, Plaintiffs were within the class of persons these Vegetation Management provisions were intended to protect.

1694. LEC failed and neglected to comply with the Vegetation Management requirements of the NESC and the Oregon Administrative Rules when it:

- a. failed to properly or timely inspect its LEC Powerlines and surroundings located in the Holiday Farm Fire Area;
- b. failed to properly or timely inspect for and remove Danger Trees adjacent to its LEC 34.5 kV Line near its crossing under the EWEB 115kV Line near highway milepost 47 in the Holiday Farm Fire Area;
- c. failed to take reasonable and necessary steps to ensure that during a high wind and Red Flag event, Danger Trees would not fall into or contact its LEC Powerline or the overhead EWEB 115 kV line near highway milepost 47 in the Holiday Farm Fire Area;
- d. failed to otherwise inspect and maintain its LEC Powerline at and near where it crossed under the EWEB 115kV line near highway milepost 47 in the Holiday Farm Fire Area in a manner that avoided igniting fires.

1695. LEC's violation of the Vegetation Management requirements of NESC and the Oregon Administrative Rules was negligent as a matter of law.

1696. As a direct and foreseeable result of LEC's negligent acts and omissions, Plaintiffs suffered the injuries and damages set forth in this Complaint and Exhibit A.

SIXTH CAUSE OF ACTION

(Gross Negligence – BPA)

1697. Plaintiffs incorporate and reallege each of the foregoing paragraphs as though

fully set forth herein.

1698. BPA knew or should have known about the multiple Fire Weather forecasts and Red Flag condition warnings issued for the Holiday Farm Fire area on or before September 7, 2020; each showing that the area presented an extreme risk for the ignition and rapid spread of wildfire.

1699. BPA knew or should have known from LiDAR and other surveys or inspections of its Cougar-Holden 115kV Line that Danger Trees existed adjacent to the Line on and before September 7, 2020.

1700. BPA knew or should have known of the extreme hazards and risks of uncontrolled wildfire created by continuing to energize its Cougar-Holden 115kV Line on the afternoon and evening of September 7, 2020 under the extreme weather conditions and in the presence of existing Danger Trees.

1701. BPA's conduct evidenced a willful, wanton, and reckless disregard of a foreseeable and substantial risk of harm to the property of others. Its misconduct included:

- a. Failing and refusing to deenergize its Cougar-Holden 115kV Line during the hazardous and Red Flag conditions present on the afternoon and evening of September 7, 2020;
- b. Failing and refusing to institute a Public Safety Power Shutdown of its Cougar-Holden 115kV Line during the hazardous and Red Flag conditions present on the afternoon and evening of September 7, 2020;
- c. Failing and refusing, in violation of its own internal rules and FERC standards, to properly locate and remove Danger Trees from along its Cougar-Holden 115kV Line before September 7, 2020.

1702. As a direct and proximate result of Defendants' gross misconduct, Plaintiffs sustained damage to their real and personal property as described in this complaint and Exhibit A.

1703. Pursuant to ORS 477.089(2)(b), Plaintiffs' economic and property damages are subject to doubling because of Defendant's recklessness, gross negligence, willfulness, and/or malice.

SEVENTH CAUSE OF ACTION

(Gross Negligence – EWEB)

1704. Plaintiffs incorporate and reallege each of the foregoing paragraphs as though fully set forth herein.

1705. EWEB knew or should have known about the multiple Fire Weather forecasts and Red Flag condition warnings issued for the Holiday Farm Fire area showing an extreme risk for the ignition and rapid spread of wildfire on September 7, 2020.

1706. EWEB knew or should have known that on or before September 7, 2020 Danger Trees existed in the area near highway milepost 47 where its EWEB 115 kV Line crossed over the LEC 34.5 kV Line.

1707. EWEB knew or should have known that these Danger Trees threatened its EWEB 115 kV Line from a direct strike and threatened the LEC 34.5 kV Line below by striking the EWEB Line and causing it to fall and contact LEC's Line below.

1708. EWEB knew or should have known that under the existing circumstances, failure to set the breakers PCB No. 7170 and No. 7180 in its Holden Creek Substation to "lockout" mode during the afternoon and evening of September 7, 2020 created an unreasonable risk of wildfire.

1709. EWEB's conduct evidenced a willful, wanton, and reckless disregard of a foreseeable and substantial risk of harm to the property and persons of others and the general public. Its misconduct included:

- a. failing or refusing to properly or timely inspect its EWEB Powerlines and surroundings located in the Holiday Farm Fire Area;
- b. failing or refusing to properly or timely inspect for and remove Danger Trees

adjacent to its EWEB 115kV Line near its crossing over the LEC 34.5 kV Line near highway milepost 47 in the Holiday Farm Fire Area;

- c. failing or refusing to take reasonable and necessary steps to ensure that during a high wind Red Flag event, Danger Trees would not fall into or contact its EWEB 115 kV Line near highway milepost 47 in the Holiday Farm Fire Area;
- d. failing or refusing to otherwise inspect and maintain its EWEB Powerline at and near where it crossed over the LEC 34.5 kV line near highway milepost 47 in the Holiday Farm Fire Area in a manner that avoided igniting fires.
- a. failing or refusing to set the breakers PCB No. 7170 and No. 7180 in its Holden Creek Substation to “lockout” mode during the afternoon and evening of September 7, 2020.
- b. failing or refusing to have personnel or representatives available respond to emergency workers’ questions regarding whether its EWEB Powerline was energized;
- c. Failing or refusing to timely respond to emergency workers’ questions regarding whether its EWEB Powerline was energized.

1710. As a direct and proximate result of EWEB’s gross misconduct, Plaintiffs sustained damage to their real and personal property as described in this complaint and Exhibit A.

1711. Pursuant to ORS 477.089(2)(b), Plaintiffs’ economic and property damages are subject to doubling because of EWEB’s recklessness, gross negligence, willfulness, and/or malice.

EIGHTH CAUSE OF ACTION

(Gross Negligence – LEC)

1712. Plaintiffs incorporate and reallege each of the foregoing paragraphs as though fully set forth herein.

1713. LEC knew or should have known about the multiple Fire Weather forecasts and Red Flag condition warnings issued for the Holiday Farm Fire area showing an extreme risk for the ignition and rapid spread of wildfire on September 7, 2020.

1714. LEC knew or should have known that on or before September 7, 2020 Danger Trees existed in the area near highway milepost 47 where its LEC 34.5 kV crossed under the EWEB 115 kV Line.

1715. LEC knew or should have known that these Danger Trees threatened its LEC 34.5 kV Line either from a direct strike, or by striking the EWEB 115 kV Line and causing it to fall and contact LEC's Line below.

1716. LEC knew or should have known of the extreme hazards and risks of uncontrolled wildfire created by continuing to energize its LEC 34.5 kV Line on the afternoon and evening of September 7, 2020 under the extreme weather conditions and in the presence of existing Danger Trees.

1717. LEC knew or should have known of the extreme hazards and risks of uncontrolled wildfire created by failing to set breakers on its LEC 34.5 kV Line to "lockout" mode on the afternoon and evening of September 7, 2020 under the extreme weather conditions and in the presence of existing Danger Trees.

1718. LEC's conduct evidenced a willful, wanton, and reckless disregard of a foreseeable and substantial risk of harm to the property and persons of others and the general public. Its misconduct included:

- a. Failing or refusing to properly or timely inspect for and remove Danger Trees in the area of its LEC 34.5 kV Line near its crossing under the EWEB 115kV Line near highway milepost 47 in the Holiday Farm Fire Area;
- b. Failing or refusing to take reasonable and necessary steps to ensure that during a high wind Red Flag event, Danger Trees would not fall into or contact its LEC 34.5 kV Line or the overhead EWEB 115 kV Line near highway

- milepost 47 in the Holiday Farm Fire Area;
- c. Failing or refusing to otherwise inspect and maintain its LEC 34.5 kV Line at and near where it crossed under the EWEB 115kV Line adjacent to highway milepost 47 in the Holiday Farm Fire Area in a manner that avoided igniting fires.
 - d. Failing or refusing to de-energize the portion of its LEC 34.5 kV Line located in the Holiday Farm Fire Area during the high wind Red Flag event on September 7, 2020.
 - e. Failing or refusing to institute a Public Safety Power Shutoff (“PSPS”) for the portion of its LEC 34.5 kV Line located in the Holiday Farm Fire Area during the high wind event on September 7, 2020.
 - f. Failing or refusing to de-energize its LEC 34.5 kV Line or set its breakers to “lockout” mode after receiving a report of a tree through a power line and damage to a pole on September 7, 2020 at 7:40 p.m.
 - g. Failing or refusing to set the breakers on its LEC 34.5 kV Line to "lockout " mode until after the EWEB/LEC Fire started.

1719. As a direct and proximate result of LEC’s gross misconduct, Plaintiffs sustained damage to their real and personal property as described in this Complaint and Exhibit A.

1720. Pursuant to ORS 477.089(2)(b), Plaintiffs’ economic and property damages are subject to doubling because of LEC’s recklessness, gross negligence, willfulness, and/or malice.

NINTH CAUSE OF ACTION

(Trespass – All Defendants)

1721. Plaintiffs incorporate and reallege each of the foregoing paragraphs as though fully set forth herein.

1722. On September 7, 2020, Plaintiffs were the owners, tenants, or lawful occupiers of real properties and maintained personal property within the Holiday Farm Fire Area. Plaintiffs'

possessory interests in their real and personal properties were exclusive.

1723. As described above, each of the Defendants acted negligently, recklessly, or intentionally in a manner that caused or allowed the Holiday Farm Fire to ignite and spread out of control, damaging Plaintiffs' properties, persons and interests.

1724. Flames, smoke, embers, ash, odors, gases, and airborne particulates came into contact with, were deposited on, damaged, destroyed and/or otherwise trespassed on Plaintiffs' real and personal property.

1725. Defendants knew or reasonably should have known that a trespass would result from their acts or failures to act described above.

1726. Plaintiffs did not grant permission for any part of the EWEB/LEC Fire, the BPA Fire, or the Holiday Farm Fire to enter properties they owned or leased. This trespass was a substantial factor in causing Plaintiffs to suffer foreseeable harm to their persons, interests, real property, and personal property.

1727. As a direct and foreseeable result of Defendants' trespass, Plaintiffs suffered the injuries and damages set forth in this Complaint and Exhibit A.

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RELIEF SOUGHT

1728. Plaintiffs pray for judgment against Defendants, and each of them, as to each cause of action as follows:

- a. For economic and non-economic money damages in an amount to be proven at trial but not to exceed the amounts contained in Exhibit A;
- b. For double Plaintiffs' economic and property damages awarded for their Causes of Action for Gross Negligence;
- c. For prejudgment interest;
- d. For post judgment interest;
- e. For attorney's fees and costs of suit where allowable by law; and
- f. For such other relief as the Court deems just and proper.

DEMAND FOR JURY TRIAL

1729. Plaintiffs demand a trial by jury for all matters and to the extent allowed by law.

Dated: January 16, 2024.

RICK KLINGBEIL, PC

/s/ **Rick Klingbeil**

Rick Klingbeil, OSB# 933326
Attorney for Plaintiff